



NATIONAL HEADQUARTERS
CIVIL AIR PATROL
United States Air Force Auxiliary
105 South Hansell Street
Maxwell Air Force Base, Alabama 36112-5937

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FCC Mail Room

14 March 2013

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Ms. Dortch,

In reference to WT Docket No. 01-289, FCC 13-2, the Civil Air Patrol (CAP) submits the following comments.

In its role as the United States Air Force Auxiliary, the CAP performs over 90% of all inland Search and Rescue (SAR) in the Continental United States as tasked by the Air Force Rescue Coordination Center. We work with hundreds of local SAR agencies like sheriff's offices and rescue squads as well.

At the present time CAP's SAR equipment resources include 550 general aviation aircraft, and over 900 ground teams in 4x4 vehicles or vans. This entire emergency response fleet is equipped with the capability of radio-direction-finding (DF) distress beacons like Emergency Locator Transponders (ELT) operating on 121.5 MHz. As funding has become available we have begun integrating a 406 MHz capability into our aircraft, but at this time it is limited to 65% of our aircraft, and only 21% of our aircraft fleet is equipped with DFs capable of detecting all channels of 406 MHz distress beacons. Worse yet, until recently there has been no ground DF equipment commercially available, and what is now available is still cost prohibitive. That results in none of CAP's ground teams having an effective 406 MHz ground DF capability, and we're sure that local SAR responders are in the same situation. Ground teams rely on 121.5 MHz to home in on survivors, in many cases when airborne assets aren't available to help narrow the search area. In 2012, CAP ground teams prosecuted 48% of its distress beacon search missions without aviation support.

The Civil Air Patrol is very much in favor of progression toward 406 MHz technology. There are still a significant number of false alarms for older 121.5 MHz beacons that would be reduced or eliminated by transitioning to 406 MHz beacons. The life-saving potential the improvements offer in 406 MHz is also without question as the system improvements point searchers to survivors quickly. However, we advise a slow and cautious transition. SAR agencies such as the CAP, local sheriff's offices and rescue squads across the country still rely heavily on 121.5 MHz transmission. The majority of distress beacons still operate on this frequency. Moreover, the current fiscal climate indicates funding to upgrade SAR resources to be 406 MHz capable is likely to be limited over the next several years.

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Therefore, it is our position that before 121.5 MHz beacons are abandoned, we must be certain that the SAR community has successfully made the transition to 406 MHz. We consider the potential for loss of life, if this transition is not well managed, to be unacceptable.

If you have any questions, please feel free to contact me at jdesmarais@capnhq.gov or 888-211-1812 extension 301.

Respectfully,



JOHN W. DESMARAIS, Sr.
Director of Operations