



June 3, 2022

Mr. Billy Nolen
Acting Administrator
Federal Aviation Administration
800 Independence Avenue S.W.
Washington, DC 20591

Re: Comments of the Regional Airline Association Regarding Continuing 5G Interference with Radio Altimeters

Dear Mr. Nolen,

As you know, regional airlines operating Embraer 145 and 175 series of aircraft are in the process of modifying their radio altimeter systems to counter the interference being caused by unregulated and soon to be unrestricted 5G, C Band telecommunication transmissions. We and our member airlines had understood that the filter addition to the radio altimeters installed in the E145 and E175 aircraft would increase the resilience of the radio altimeter receivers from 5G C Band interference from Group 1 to Group 4, thus allowing the FAA to release AT&T and Verizon from their voluntary mitigations and allow them to continue to deploy transmission towers in proximity to airports and increase transmission power, while preserving the safety of low visibility operations.

We acknowledge the work that the FAA has undertaken so far to provide for continuing operations in low visibility conditions at certain affected airports using the AD, NOTAM and AMOC process. We also acknowledge the role of the FAA in the accelerated approval process for service bulletins, and filter modifications for our Group 1 aircraft. These modifications, when completed, will allow low visibility operations for the time being at priority airports; however, as you have heard, like many aircraft modification programs, the availability of modification kits for the Embraer 175 is making suggested timelines unrealistic. We are also concerned that as telecom towers continue to be deployed without agreed mitigations, the filter modifications will be rendered ineffective. We say this because we noticed that in the latest AMOCs issued by FAA for the E145 and E175 aircraft with the filter modifications, neither KBFL, Bakersfield, CA, or KHIO, Hillsboro, OR were cleared. We understand that the reason for this is that neither of these airports are priority airports and *that we should expect more of these restrictions on non-priority airports in the future.*

When the Agency establishes priority vs. non-priority airports, it creates a system of haves and have-nots within the aviation airspace. "Non-priority airports" certainly would be a priority airport for any

passenger traveling through or to such airports. As you know, these airports have invested millions in becoming all weather airports and the airlines who serve them have invested heavily to provide this service. Restrictions to operations in low visibility conditions at “non-priority” airports reflects a troubling disregard for the smaller airports that travelers from small and rural communities rely on. We are also concerned that when the voluntary mitigations agreed to by AT&T and Verizon expire for the priority airports and as a result transmission towers and power levels expand and impact more and more airports that we will see the same restrictions applied to airports that we once considered safe for low visibility operations.

We have also come to learn in the last few days that that, despite the filter modifications that ostensibly will raise the resilience of regional airlines’ radio altimeter systems to Group 4, even this level of resilience will not be sufficient to protect against 5G transmissions after the end of 2023, and that further modifications are likely to be needed. Considering the significant cost of the filter modifications and the likelihood that future modifications will be more costly, this calls into question the future coexistence of airlines and the telecommunications companies and whether airlines should now cancel current modification plans until more information is forthcoming from the FAA as to the future 5G environment, as well as subsequent 6G and 7G rollouts. While we acknowledge the desire for the telecom companies to expand their 5G coverage, the safety of our passengers and crews during operations is our highest priority and all our combined efforts must be toward that end.

These recent revelations are very troubling and call into question any commitments that our member carriers have made regarding modifications to their aircraft. Complete transparency is vital in this situation, and we ask that the FAA hold future meetings that are receptive to the concerns of the airlines who seek your support for safe operations in the U.S. NAS. We also urge the FAA to uphold its commitment to protecting our nation’s airspace from undue interference, whether the airspace in question is deemed a “priority” or not.

Respectfully submitted,



Bill Whyte
Vice President, Aviation Operations & Technical Services