



Willie Walsh
Director General

2 February 2023

The Honorable Pete Buttigieg
Secretary
US Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590
USA

Mr. Billy Nolen
Acting Administrator
US Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591
USA

Dear Secretary Buttigieg and Acting Administrator Nolen,

On behalf of our more than 100 IATA member airlines that serve the US market, I am writing to express our continued concern about potential flight disruptions that will occur when airlines, through no fault of their own, fail to meet the Federal Aviation Administration (FAA)'s upcoming 5G radio altimeter retrofit deadlines.

We recognize and appreciate the fact that the Department of Transportation and the FAA have limited authority to require telecommunications providers to protect against interference with aircraft radio altimeters from their 5G installations. We also appreciate your leadership in securing temporary relief from the telcos that has allowed carriers to continue to operate to US airports over the past 12 months.

However, it is now clear to everyone (the FAA, the aircraft manufactures, the radio altimeter manufacturers, and airlines serving the US) that many operators will not make the proposed July 2023 (and in some cases the March 2023) retrofit deadline owing to supply chain issues, certification delays, and unavoidable logistical challenges. It is critical that we acknowledge and accept that fact and move collectively to change our approach to this issue now, before many carriers are unable to continue to serve the US market during the peak summer travel season.

Today, the FAA relies on aircraft and radio altimeter manufacturers to individually work with their airline clients to secure completion of the necessary aircraft retrofits. While the FAA gets periodic reports from those parties as to progress by each of them, no overall plan exists to reach the FAA's proposed retrofit targets. When asked for an overall plan, the FAA directs the questioner to the manufacturers.

This approach clearly will not enable us to collectively reach any of the proposed retrofit deadlines. Instead, we urge the FAA to develop a project plan that includes milestones agreed to by all involved in the retrofit implementation. In order to inform that plan, the FAA should request that aircraft and radio altimeter manufacturers provide a written report on the status of the retrofits of carrier aircraft. This would include the status of any remaining necessary certifications of radio altimeter solutions, the status of required service bulletins, the dates as to when kits will be delivered to carriers, the number of aircraft subject to retrofit (either full replacement or modifications of existing radio altimeters), and the projections as to when the retrofits will be completed. The FAA should use that information to develop a project plan that identifies realistic timeframes agreed to by all parties as well as means by which to address barriers to success. The parties should meet on a bi-monthly basis to review progress and take any corrective actions.

A well-crafted implementation project plan clearly offers greater opportunities for success than today's decentralized approach. It will also give the telcos a realistic picture as to progress to date and an expectation as to when they can take full advantage of their 5G investment. Finally, it will inform the US Government as a whole as to what steps may need to be taken if the current deadlines prove unachievable.

IATA would welcome the opportunity to be an active participant in this 5G retrofit implementation plan and support our members' retrofit process. We look forward to working with the Department and our members to identify and implement rationale solutions to this challenge.

Thank you for your consideration.

Yours sincerely,

Willie Walsh
Director General
International Air Transport Association

cc: Mr. Guillaume Faury
CEO
Airbus

Mr. Stephen Timm
President
Collins Aerospace

Mr. David Calhoun
CEO and President
Boeing

Mr. Patrice Caine
CEO
Thales Group

Mr. Francisco Gomes Neto
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Mr. Darius Adamczyk
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