



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave  
Washington, DC 20591

MAR 18 2019

Captain Mark Bradley  
Chairman, Performance Based Operations  
Aviation Rulemaking Committee (PARC)  
Delta Airlines  
1030 Delta Boulevard  
Atlanta, GA 30354-1989

Dear Captain Bradley:

We recognize the time and effort the PARC Communications Working Group has put into both the comprehensive analysis and the recommendations provided in the FANS 1/A over SwiftBroadband (SBB) Evaluation Results and Recommendations. We would like to thank you, and the PARC, for your diligence and offer these responses to the three recommendations:

1. The FAA agrees with the PARC recommendation to accept FANS 1/A over SBB as a viable subnetwork for FANS 1/A operations that require State authorization for Required Communication Performance (RCP) 240 and Required Surveillance Performance (RSP) 180.
2. The Federal Aviation Administration (FAA) agrees that aircraft equipped to use the SBB subnetwork for data link communications, which meet all of the applicable technical and performance requirements, should be eligible for Air Traffic Management (ATM) Operations internationally that require State authorization for RCP 240 and RSP 180. We will advocate within the International Civil Aviation Organization accordingly. In conjunction with this recommendation, the FAA will advocate for monitoring the performance and network availability related to SBB communications to ensure continued acceptability, in alignment with the Performance-Based Communication and Surveillance (PBCS) framework.
3. The FAA also agrees that the use of new technologies provides diversity and potential for advances in capability. With the implementation of the globally accepted PBCS framework, the operational benefits associated with these advances can be maximized and safety can be ensured. We will continue to work with industry, PARC, and the international community to advocate for greater exploitation of those capabilities combined with the assurance of the associated safety, as they become available and reliable to support aviation operations.

This response was coordinated throughout applicable lines of business in the FAA.

If you have any questions, please contact Mark Steinbicker, Manager, Flight Technologies and Procedures Division at (202) 267-8790.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Bahrami', with a stylized flourish at the end.

Ali Bahrami

Associate Administrator for Aviation Safety