



May 13, 2025

Federal Aviation Administration
800 Independence Ave. SW
Washington, DC 20591
ATTN: Manager, Flight Service, Safety & Operations, AJR-B1

Re: *Docket No. FAA-2025-0558 - Notice of Intent To Decommission Flight Service Remote Communications Outlets (RCOs)*

To Whom it May Concern,

For decades, the Aircraft Owners and Pilots Association (AOPA), Vertical Aviation International (VAI), and the Experimental Aircraft Association (EAA) have championed the safety, innovation, and accessibility of aviation in the United States. AOPA, founded in 1939, has long served as the voice of general aviation pilots, advocating for policies that protect the freedom to fly and industry safety. Similarly, VAI—representing the vertical flight community for over 75 years—has led safety-focused efforts to advance helicopter and emerging vertical aviation technologies. EAA, since 1953, has focused on recreational pilots and those operating aerobatic, antique, and contemporary manufactured aircraft.

Together, our organizations share a deep-rooted commitment to fostering a safe, efficient, and forward-looking airspace system that supports the evolving needs of the aviation community. It is with this shared mission that we submit the following comments in response to the recent Notice of Intent to Decommission Flight Service Remote Communications Outlets (RCOs) (for purposes of this letter, “the Notice”).

We have concerns about the proposed RCO decommissioning as presented and request consideration of an alternative solution with a more targeted and gradual drawdown of the RCO network until sufficient alternatives are available in the future.

We are also aware that a Safety Risk Management (SRM) Panel is taking place the week of May 12th and want to ensure that the findings and recommendations of that panel are fully factored into FAA’s determination on this issue. We also request an additional opportunity for public comment once the SRM Panel has been completed, and findings are available.

The need for RCOs remains

AOPA, VAI, and EAA understand and support the need to reduce costs associated with maintaining and managing the National Airspace System (NAS), particularly by moving toward state-of-the-art technology and looking to reduce older and lesser-used equipment. Certainly, we agree that there are far fewer pilots now

utilizing the RCO network than there were several decades ago and have no reason to doubt the data FAA has shared reflecting this reduction in usage.

However, while the number of users is far lower, there are still many pilots who need to be able to contact Flight Service (FSS) while airborne, meaning that the removal of the RCO network has a significant safety impact. Pilots use this communication for critical services, some of which could be critical to continued safe flight, including (but not limited to):

- Opening and closing flight plans
- Transborder operations (i.e. communicating updates to CBP)
- Receiving weather updates
- Relaying ATC clearances
- Submitting PIREPs
- Reporting GPS anomalies
- Receiving emergency information (i.e. national ground stops)
- Emergency services (i.e. VFR lost aircraft, NORDO broadcasts)

Interestingly, the Notice makes the following statement:

“Technology (e.g., mobile technology) has made it possible for users today to receive the information and services that Flight Service provides without the need for radio communications.”

This statement seems to indicate FAA is focusing solely upon pilots communicating with FSS while on the ground (since mobile technology is not widely accessible while airborne). Our associations concede that there is little need for pilots to use an RCO to communicate with FSS while on the ground across most of the US, given the wide availability of mobile phones, apps, and other services. That said, there are areas, particularly in the western US, where these services are not available and where other radio coverage is not available on the ground.

Our concerns are primarily focused on the fact that there is a significant need for pilots to communicate with FSS while airborne.

While 290 RCO contacts per day does not sound like a lot, it is, in fact, significant, equating to over 108,000 contacts per year. And, for many of those pilots utilizing the service, it is of critical importance, providing a required level of safety.

Not only that, but the RCO network was established to provide pilots with the ability to contact FSS in areas where radio coverage is otherwise limited. They were placed in specific areas to fill in the gaps between coverage provided by other stations. By eliminating the RCOs, many of those gaps will reappear and some may not even be identified until an emergency is present.

It is also noteworthy that, aside from the RCO usage numbers as documented by FAA, there is an inherent “backup” capability that RCOs provide. For example, in the event of a large-scale radio frequency or ATC outage (as was seen with the Chicago Center fire in 2014), RCOs can provide a critical fallback capability for many pilots. This is something that cannot be quantified in FAA’s usage numbers.

Further, with the pending efforts by the Trump administration to modernize Air Traffic Control technologies, we believe RCOs should not be decommissioned until we have a full understanding of what a potentially new ATC system will entail and if RCO services can be utilized in the redesigned system.

There are currently no sufficient alternatives

At present, we are unaware of any alternative systems that could accommodate the communications made via RCOs in their absence. Most general aviation (GA) aircraft do not have the ability to access the internet while airborne. Additionally, while FIS-B can provide some weather and NOTAM information, there is a very large number of GA aircraft that are not equipped with ADS-B In – and this system does not provide two-way communication capability.

It has been suggested that ATC could assume responsibility for these duties. However, there are multiple problems with this:

- Controllers have historically been adamant that they have neither the workload bandwidth nor the willingness to assume the liability for receiving and processing flight plan requests (not to mention other services). Adding additional duties to controllers at a time when ATC staffing is at critically low levels is not prudent for safety.
- The RCO stations themselves would still need to be maintained in those areas where ATC radio coverage is not sufficient.
- There would likely be an increase in communication congestion on ATC frequencies when pilots are transmitting or receiving information such as flight plans.

As a result, in the short-term, AOPA, VAI, and EAA cannot support a wholesale decommissioning of the RCO network until such a time as there is a solution providing an equivalent level of service and safety for all pilots.

Recommendation

Despite the concerns outlined above, our associations do believe there is an opportunity for FAA to realize significant cost savings by examining and implementing a targeted and gradual shutdown of the network. To accomplish this, we recommend focusing on areas experiencing the lowest RCO utilization and where there is sufficient radio coverage overlap for pilots to reach FSS via other nearby RCOs, common FSS frequencies, or voice-enabled VORs.

One suggestion would be for FAA to determine nationally how many RCOs would be needed to provide appropriate coverage for all airspace users.

Along those lines, if there is an RCO that has not been used for a long period of time, and it is determined that there would still be otherwise sufficient radio coverage to contact FSS following its removal, there would likely be little objection from the pilot community or the undersigned Associations.

Over the next several years, we expect to see advancements in mobile technology, such as mobile phone calling directly from smartphones to satellite, that should enable RCOs to go away completely. However, we are not there yet, and we must allow time for such alternatives to develop before removing the RCO network as a whole.

Conclusion

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AOPA, VAI, and EAA understand and applaud FAA's efforts to reduce costs in managing the NAS and moving toward a more modernized system. We acknowledge that as sufficient replacements become available over the coming years, the RCO network can likely be decommissioned, but with a thoughtful and phased approach.

Until a solution is available that provides an equivalent level of service, we cannot support a complete decommissioning in the short-term. The reduction in safety for a significant number of pilots is simply too great.

Thank you for reviewing our comments on this important issue. Please feel free to contact us using the information in our signatures below if you have any questions.

Sincerely,

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Director, Regulatory Affairs
AOPA

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