



April 14, 2025

The Honorable Ted Cruz, Chairman
Committee on Commerce, Science and Transportation
U.S. Senate
Washington, D.C. 20510

The Honorable Jerry Moran, Chairman
Subcommittee on Aviation Safety, Operations and
Innovation
Committee on Commerce, Science and Transportation
U.S. Senate
Washington, D.C. 20510

Dear Senators Cruz and Moran:

We, the undersigned aviation industry stakeholders, known henceforth as the Coalition, thank you for soliciting our input on a matter of critical importance to the operational safety and efficiency of the National Airspace System (NAS). As representatives of our nation's aviation sector, we share in your grief over recent aviation accidents and the commitment to making sure accidents like these never happen again. We are profoundly grateful for your leadership and collaboration.

We have been very encouraged by the leadership of President Donald Trump and Secretary of Transportation Sean Duffy on this issue. We look forward to the Administration's proposal and hope it, in addition to the FAA Reauthorization Act of 2024, will be the foundation on which we can build an ATC system that is the envy of the world, reduces costs, and ends inefficiencies while upholding the highest standards of safety for all who use our nation's airspace. This is a unique opportunity where the Administration, Congress, and industry can work together to raise our nation's ATC system to a new, higher level through investment, innovation, and modern technology.

We believe any plan developed must focus on the following key priorities:

- 1) Robust emergency funding for critical air traffic control technology and infrastructure and controller and technician staffing and training.
- 2) Direction to FAA to achieve prudent divestment from legacy NAS elements and utilize their existing procurement authority to facilitate the effective deployment of state-of-the-art technology.
- 3) Realignment and modernization of ATC facilities to improve operational efficiencies and leverage technological improvements and investments.

- 4) Exemption of the FAA from government shutdowns to ensure more predictable funding and support for continued safety and air traffic control personnel hiring and training, and other critical FAA activities.
- 5) Continuation of general fund support of FAA operations and consideration of additional flexibility within the Airport and Airway Trust Fund (AATF) to meet existing obligations and help FAA manage long-term facility and technology upgrades through access to long-term capital funding and multi-year budgeting.

To maintain a best-in-class ATC system that is globally competitive, our unified objective is to work with Congress and the Administration to find common ground on these priorities to ensure the operational safety and efficiency of the NAS. We are also aligned on not pursuing privatization of ATC services and believe it would be a distraction from these needed investments and reforms.

Robust Emergency Funding for Technology, Infrastructure, and Workforce

The Coalition is supportive of DOT/FAA making an immediate robust, emergency funding request for both controller hiring and training and ATC critical infrastructure investment in facilities and technology, and to then work with Congress in approving this request.

Air Traffic Controllers and Technician Workforce:

The Coalition remains focused and supportive in addressing these very important safety-related staffing shortages.

A properly staffed controller workforce at FAA facilities and contract towers is necessary to safely and efficiently meet operational, statutory, and contractual requirements, while also providing personnel the resources to research, develop, deploy, and then train the existing workforce on new procedures, technology, and modernization initiatives. Without a sustainable hiring, training, and staffing model, the FAA will struggle to maintain the current capacity of the system, let alone modernize or expand it for new users.

Work at FAA also needs to be prioritized to ensure robust controller hiring and training and addressing testing, curriculum, and technology issues. This includes a more effective ATC Skills Assessment Test for entry into the FAA Academy in Oklahoma City and leveraging the private sector through the Collegiate Training Initiative and other methods. In addition to maximizing controller hiring, the FAA Reauthorization Act of 2024 included other first-time provisions, such as exploring capacity expansion at the FAA's Training Academy in Oklahoma City and deploying tower simulator systems at all FAA towers, which have been proven to enhance training and reduce time to certification in towers by approximately 27% (nearly six months on average).

The FAA technical operations workforce staffing has also declined to a critical level. Without an adequate number of certified technicians on duty, disruptions to critical infrastructure systems could escalate, potentially resulting in complete air traffic control shutdowns at major airports nationwide. To mitigate against these risks, there must be a proactive strategy to rebuild and sustain a highly skilled technician workforce capable of helping to meet the growing demands of the U.S. aviation industry.

Facilities:

There are system sustainability and maintenance-related issues at virtually all FAA locations, which can lead to operational risks for the NAS. Roughly 90% of FAA's budget for Facilities and Equipment (F&E) goes to sustainment, while other critical NAS systems improvements remain neglected. According to the Government Accountability Office, FAA's operational risk assessment evaluating the sustainability of all ATC systems found that of FAA's 138 systems, 51 (37%) were unsustainable and 54 (39%) were potentially unsustainable. Of the 105 unsustainable and potentially unsustainable systems, 58 (29 unsustainable and 29 potentially unsustainable systems) have critical operational impacts on the safety and efficiency of the national airspace.

The FAA's air traffic infrastructure is a vast network of nearly 350 air traffic control towers and terminal radar approach control (TRACON) facilities, 22 air route traffic control centers (ARTCC), and 265 FAA

contract towers. Federal funding has been used mainly for the sustainment of this existing infrastructure, but this approach has failed to provide a reliable, stable source of funding to address recapitalization, let alone prepare for increases in commercial space and other new entrants. All ARTCC buildings were constructed in the 1960's, with an average age of 61 years. A growing number of air traffic control facilities are deteriorating and in general disrepair. According to the FAA, there are 174 FAA-owned air traffic control towers and TRACON facilities that are in poor condition with many being more than 40 years old. There is also a list of aging sponsor-owned contract towers that need to be replaced or repaired. Air traffic controllers should have safe and secure towers to effectively manage and ensure the safety of air traffic

Many of the FAA's facilities require considerable replacement efforts because of their size and complexity. This recapitalization will be the first in FAA history and will require both the infusion of robust emergency funding and a stable and predictable annual funding source for a successful long-term recapitalization effort. A strong infusion of emergency funding will allow us to begin to build the ARTCC, TRACON, and tower facilities of the future, encompassing the best of structural, technological, and safety enhancements. In this regard, the FAA should look towards a minimum equipment list for facilities as warranted. Modernization resulting in increased resiliency and reliability of the FAA's ATC system must be paired with a robust and highly skilled federal technical workforce to maintain and repair the critical systems necessary for the FAA's round-the-clock operation.

Technology:

The long-term answer to ensure the NAS continues to be the gold standard of safety and efficiency is implementing a complete technological overhaul with a lasting commitment to innovation. Fulfilling that imperative will take time, but in the interim the following investments will provide critical near-term steps toward getting us closer to that long-term vision. Such improvements with emergency funding should include NOTAM and other critical/aging system upgrades to ensure stabilization and continuity of service; the critical upgrade of telecommunication networks; radar replacement; the sustainment and enhancement of oceanic, enroute, and terminal automation platforms; and airborne situational awareness technology to enhance aviation safety at smaller airports. These investments will support improved safety and performance, enhanced reliability and compatibility with the latest air traffic management initiatives and, in some cases, vital national security efforts.

The FAA should also consider accelerating and expanding the deployment of technologies developed in the U.S. that are currently in operation around the world, such as electronic flight strips, remote and digital towers to enhance existing air traffic services, space-based technologies, arrival and departure management systems, runway status lights, advanced surface movement guidance systems, cloud-based flight data processing systems, and integrated air-ground data communications platforms as well as ground integration of existing and new aircraft airborne equipment. Further examples of technologies developed in the U.S. that are currently in operations around the world include collaborative decision-making tools, digital aeronautical information management systems, and advanced wake turbulence monitoring systems.

The FAA, working with industry, has shown that it is possible to utilize technologies developed in the commercial marketplace through a program to provide air traffic controllers with tools to improve runway safety. These have the potential now to be rapidly deployed to nearly all airports with an operating control tower expeditiously. The agency should utilize input from a broad group of aviation stakeholders to help prioritize and effectively deploy these technologies including consideration of process improvements in certifying products and services.

Acquisition Reform

The fiscal year 1996 Department of Transportation and Related Agencies Appropriations bill (P.L. 104-50) included important provisions for FAA personnel and procurement reform. FAA began the mandated reforms by first creating a new acquisition management system designed to reduce the time and cost of acquiring systems and services. Unfortunately, opposition from other agencies and bureaucratic inertia stopped its implementation progress. We cannot let that happen again, and the Administration and Congress should push FAA to enlist whatever government or private sector expertise is needed to design

a new acquisitions system that has as its goal rapid system-wide replacement and upgrade consistent with safety. The safety critical nature of the ATC system demands close collaboration between government, industry, and the FAA workforce, and transparent and proactive communication.

The FAA should consider expanding on an acquisition strategy focused on modernizing its technical platforms through constant, iterative improvements to minimize the risk of technology becoming obsolete. This could include embracing performance-based contracting for a service, which would allow the FAA to divest outdated technologies while requiring the private sector to continuously upgrade the platform for performance, with the agency maintaining program and safety oversight.

Any program should also include real-time data collection and analysis to track progress, optimize resource allocation, and address cybersecurity concerns. Clear and concise annual performance targets and metrics should be set, and transparency and oversight processes provided to ensure accountability and performance by implementing agencies and contractors.

Moreover, to help ensure timely execution and accountability in the planning, development, and deployment phases, we believe congressional oversight should be ongoing to ensure key milestones and timelines are met and transparency is maintained to measure the progress of acquisitions reform.

Consolidating/Realigning Facilities

The commitment to examine the consolidation of facilities and the decommissioning of outmoded and rarely used NAS equipment is also important. While we need facility recapitalization, it must be recognized that the scope of this effort is so vast that consolidation will need to be a key part of the solution; otherwise, these costs will dwarf even the most significant resources provided by industry and government for recapitalization.

Technological improvements offer a real opportunity for improving service and reducing costs. The DOT Secretary and Congress should leverage stakeholder groups and independent technology experts to advise on the decommissioning or consolidation of installations and staffed facilities. Participants must include operators, airports, labor organizations, and manufacturers to make sure decisions utilize the latest technological advances, are sustainable in terms of user and employee support, and do not diminish safety or system resiliency. We believe this collaboration will result in a more effective and informed transition to facility realignment and maximize the potential for operational efficiencies and facility improvements.

This work was anticipated in the FAA Reauthorization Act of 2024, which included a provision that directs FAA to contract with a federally funded research and development center to develop an ATC facility realignment report to examine consolidation and reorganization of air traffic facilities and management of airspace.

Government Shutdown

Federal government shutdowns are extremely detrimental to the FAA by suspending air traffic controller hiring and training, delaying the implementation of safety initiatives and certification projects, postponing maintenance and repair work to critical air traffic equipment, delaying air carrier pilots and other operators check rides and airworthy inspections for aircraft, deferring the analysis of voluntary safety reporting, and suspending work on modernization and airport infrastructure programs. During a shutdown, while air traffic controllers and safety inspectors among others will continue to work without pay, many FAA employees are furloughed, meaning that they cannot perform their duties that support aviation safety, aircraft certification, and the integration of new entrants. The programs that the FAA uses to review and address safety events are suspended. The ensuing backlogs from government shutdowns cause further delays in these critical FAA services long after funding resumes.

To remain the world leader in aviation, we must continue to strive to improve efficiency and further mitigate risk. A shutdown will exacerbate the air traffic controller staffing shortage by delaying an already-lengthy hiring and training process. A shutdown requires the FAA to suspend all hiring and close its training academy in Oklahoma City, which takes additional time to restart after a shutdown ends.

Furthermore, shutdowns are both costly and harmful to our economy. The Congressional Budget Office's analysis found that the 35-day shutdown in December 2018 through January 2019 cost the U.S. economy \$3 billion in forgone economic activity that was never recovered.

Therefore, the Coalition supports Senator Moran's bill, S. 1045, which provides funding from the AATF for all FAA activities in the event of a government shutdown.

Budget Reform

While the priority must be focused on the emergency funding necessary to modernize the ATC system, Congress should ensure the continuation of general fund contributions to FAA operations in recognition of the military's use of the system and the public benefits of a safe and efficient air traffic system. Congress should also consider ways to more effectively utilize the AATF for needed facility upgrades and system modernization with appropriate congressional oversight while protecting continued investments for airports and safety programs. This would bring the FAA's F&E capital program more in line with the approach taken by other transportation programs such as the surface transportation program and the Airport Improvement Program's contract authority. In addition, Congress should also raise annual authorization and appropriations levels for facilities and equipment to accommodate inflationary increases that have eroded buying power. This will address both sustainment and ongoing modernization efforts. As you know, users of our aviation system solely provide the taxes and fees that fund the AATF.

Consideration should also be given to altering the FAA's budgetary process. This includes amending current requirements of Office of Management and Budget review and the internal process of the FAA's Joint Resource Council to authorize and fund technology renewal and replacement to facilitate performance-based service contracts. Implementation of such a recommendation will allow the FAA to delineate a technology end-state, and then budget, schedule, and contract, with Congress approving funding in "useful segments". Such an approach will enable a more rapid multi-year system modernization that more easily accommodates and incorporates technological advancements, reducing costs and risks.

Conclusion

We collectively believe this is a once-in-a-lifetime opportunity to make significant and long overdue investments needed to raise our nation's air traffic control system to a new, higher level. We appreciate your leadership on this issue and look forward to advancing this initiative. Please let us know how the aviation industry can continue to support your work. Together, we can ensure that our nation's air traffic system remains the safest and most modern in the world.

*Aeronautical Repair Station Association
Aerospace Industries Association
Air Line Pilots Association, International
Air Medical Operators Association
Aircraft Electronics Association
Aircraft Owners and Pilots Association
Air Traffic Control Association
Airlines for America
Airports Council International – North America
Allied Pilots Association
American Association of Airport Executives
American Institute of Aeronautics and
Astronautics
Association of Flight Attendants-CWA
Association of Medical Services
Association for Uncrewed Vehicle Systems
International
Association of Professional Flight Attendants
Aviation Technical Education Council*

*Cargo Airline Association
Coalition of Airline Pilots Associations
Experimental Aircraft Association
General Aviation Manufacturers Association
Global Business Travel Association
International Aircraft Dealers Association
International Air Transport Association
International Council of Air Shows
National Agricultural Aviation Association
National Air Carrier Association
National Air Traffic Controllers Association
National Air Transportation Association
National Aircraft Finance Association
National Association of State Aviation Officials
National Business Aviation Association
NetJets Association of Shared Aircraft Pilots
Professional Aviation Safety Specialists, AFL-
CIO
Radio Technical Commission for Aeronautics*

*Recreational Aviation Foundation
Regional Airline Association
Southwest Airlines Pilots Association
Transportation Trades Department, AFL-CIO
Transport Workers Union of America, AFL-CIO*

*United States Parachute Association
U.S. Contract Tower Association
U.S. Travel Association
Vertical Aviation International
Vertical Flight Society*