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Comment on FR Doc # N/A

This is a Comment on the **National Institute of Standards and Technology (NIST) Other: [Profile of Responsible Use of Positioning, Navigation, and Timing Services](#)**

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Comment

I will start with evidence provided by the FAA proving that GPS does not even have two 9s of availability and reliability: <https://sapttest.faa.gov/raim-summaries.php?outageType=129001450>

PNT for aircraft is all about positioning and navigation, where am I and where is the runway, because I am extremely low on fuel (it is uneconomical to carry extra weight) and I am IMC (in meteorological conditions and cannot see one foot in front of me all of the way to hitting the (hopefully) runway. We had developed CatIIIc eLoran, using pressure altitude altimetry (GPS aircraft installations use that because it is more accurate than GPS altitude) just like the pilot altimeter. Localizer and Glideslope and DME to land on the runway threshold, pointed down the runway, hands off, every runway including your back yard grass strip. eLoran was installed over the continental US, cost \$12M to operate annually, and was working doing that, when it was abruptly shut off, ostensibly to save \$12M/year. It could not be jammed by a bad actor. It could not be spoofed by a bad actor. With the H field aircraft antenna, it was not bothered or confused by thunderstorm weather. With a multichain receiver it had more 9s than you would ever need. Management summary: better than GPS (our only PNT) in all parameters.

The dozen or so transmitter sites in the continental US are still there, abandoned. The buildings and equipment will need work because of looting. Wild Goose (International

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Loran Association) can be reconstituted. The vender that built and installed the eLoran equipment is still around (equipment lost can be duplicated). Use the data channel to send electronic ASF additional secondary factor map, like the WAAS "channel" is used to correct GPS propagation anomaly.

If you want to know how we did Catlllc to anywhere you want to better than GPS performance, my how to paper is in the ILA library. We also used this during the Viet Nam war for precision bombing. Just because it is old does not mean it is not the best that there is. You can do this again, just turn the transmitters back on.