

From: Dan Underwood
Sent: Thursday, October 3, 2019 12:09 PM
To: Berry, Morgan L. (SPC)
Cc: Rick Coles
Subject: Ruso - Feedback received from Minot AFB Helo Group

LATE-FILED EXHIBIT NO. 51(c)

EXTERNAL MAIL: Caution Opening Links or Files

Morgan,

We just received this from the Minot AFB Chief of Safety for the 582d Helicopter Group. This was prompted from our reach out to Lt Col Toomer.

Please let Rick and myself know if you'd like to discuss further.

Dan U.

Good Morning,

Regarding Aircraft Detection Lighting Systems (ADLS), this type of system poses multiple safety and tactical threats to helicopter operations in the missile fields. We are against the employment of ADLS and partial implementation and advocating for full-time NVG compatible lighting on projects in the missile field GAOIs.

As far as safety goes, we have our doubts about the system's ability to 100% reliably detect and activate when a small aircraft operating at low altitude and in flight profiles that are not typically of transitory air traffic. There are a number of ADLS systems on the market that meet or exceed the requirements spelled out in the attached extract from FAA AC 70/7460-1L but to the best of my knowledge, this is the first contact our community has had with this kind of system. From what I have seen of the FAA's tests they are very fixed-wing centric. As an example, please follow the link to read the FAA's test report for the DeTect HARRIER system:

(<https://www.airporttech.tc.faa.gov/DesktopModules/EasyDNNNews/DocumentDownload.aspx?portalid=0&moduleid=3682&articleid=164&documentid=191> [airporttech.tc.faa.gov]). Note that no flight tests were performed

Our tactical concerns focus on Operations Security. There is a small concern in regards to a third party potentially tracking our movements with active radar. Our larger concern focuses on the system's ability to expose our position to opposition forces during a real-world mission or event. If a helicopter were to respond to a real-world event the possibility exists that ADLS would highlight and give away the helicopters location due to the light activation sequence. This would severely degrade our capability and jeopardize mission accomplishment.

We are requesting full-time NVG compatible lighting on projects in the missile field GAOIs. Per para 14.2.3 of the attached AC, our legal justification is "Acceptance of ADLS applications will be on an case-by-case basis and may be modified, adjusted, or denied based on proximity of the obstruction or group of obstructions to airports, low-altitude flight routes, military training areas, or other areas of frequent flight activity."

Please let me know if you have any questions or concerns.

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