

October 30, 2023

**Via Email**

robert.hampshire@dot.gov

Dr. Robert C. Hampshire  
Deputy Assistant Secretary of Transportation for Research and Technology and Chief Science Officer  
U.S. Department of Transportation  
Office of the Assistant Secretary for Research and Technology  
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Dear Dr. Hampshire,

We, the undersigned, have concerns about the fairness of a [Request for Information \(RFI\) entitled "Commercial eLoran Capability"](#) issued by the U.S. Department of Transportation (DOT) on October 3, 2023. The RFI:

- has been issued to determine if there is interest from private entities in offering a U.S. commercial eLoran service on a fee-for-service basis;
- asks potential offerors of such a service to identify what impediments stand in the way of offering that service; and
- states that "If lack of access to any **federally-controlled assets and non-budgetary assistance** related to utilizing such federally-controlled assets are identified as impediments to offering such a service, a subsequent Request for Information may be issued to obtain additional data."  
*[emphasis added]*

It is clear from the RFI's language that DOT is considering future support **specifically and solely for eLoran** in the way of "federally-controlled assets and non-budgetary assistance." Otherwise, it would not mention the possibility of another RFI if such impediments are identified in this initial RFI.

As senior executives of companies that offer or seek to offer commercial alternative Positioning, Navigation, and Timing (PNT) services, both terrestrial and space based, each of us believes that we could potentially benefit from access to certain "federally-controlled assets," "non-budgetary assistance," or both. We are surprised and puzzled then that DOT has issued this RFI specifically and solely to potential offerors of one alternative PNT solution: eLoran.

As DOT clearly articulates in the RFI, "No single solution for the provision of Complementary PNT services can meet the diversity of critical infrastructure application requirements," adding that "It would be inefficient and anti-competitive for the Federal Government to procure or otherwise fund a specific Complementary PNT solution for non-Federal users." This language fully comports with our view that the United States needs the broadest possible range of technologies to meet the PNT requirements of critical infrastructure; however, it does not appear to align with the RFI's intent of singling out eLoran.

We also note that Congress has provided the Department funding in Fiscal Years 2022, 2023, and in proposed 2024 Transportation Housing and Urban Development Appropriations bills to ensure the adoption of "multiple technologies to promote diversity in PNT functions."

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Accordingly, we recommend that DOT reconsider the subject RFI and/or reissue an amended version to apply to **all** offerors or potential offerors of complementary PNT services. We believe this is necessary if the Department wishes to treat all vendors equally and meet the stated goal of ensuring an even playing field for all alternative PNT technologies.

Sincerely,

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