



uAvionix Corporation
300 Pine Needle Lane
Bigfork, MT 59911 U.S.A.

March 13, 2026
Steven Rhine
Rhine Labs
503-475-3347

Re: Request for Product Schematics – Washington State Right to Repair Inquiry

Dear Mr. Rhine,

Thank you for your correspondence requesting schematics and technical documentation for the uAvionix skyBeacon and tailBeacon ADS-B transmitters (the "Product"). uAvionix prides itself in making as much information as possible easily accessible through our website, to all parties without restriction. This includes all FAA-approved data, user manuals, installation guides, Instructions for Continuing Airworthiness, Flight Manual Supplements, firmware, update tools, and Service Bulletins. Maintenance for the majority of our avionics are "on condition", and as the FAA Part 21 Production Approval Holder, uAvionix is authorized and willing to rebuild or replace avionics as needed.

In responding to your request, we also considered our obligations under Washington's recently enacted Right to Repair Act (2025), codified under Washington law and effective January 1, 2026 (the "Act"). The Act applies to "digital electronic products," a category designed to encompass consumer goods such as computers, cell phones, and appliances "generally used for personal, family, or household purposes." The Product is not a digital electronic product within the definition of the Act and is, instead, a certified avionics device (specifically, an ADS-B transmitter) subject to type certification, production approval, and ongoing airworthiness requirements under Title 14 of the Code of Federal Regulations. Even if the Product arguably fell within the definition of "digital electronic equipment," the Act expressly exempts "public safety communications equipment." Because the Product transmits aircraft identification and position data that is integral to national airspace safety, air traffic control separation, and collision avoidance, it falls within this exemption.

In addition to the reasoning above and just as importantly, federal law restricts our ability to disclose the requested information. First, the Federal Aviation Administration comprehensively regulates the design, production, and maintenance of certificated aircraft equipment under the Federal Aviation Act (49 U.S.C. § 40101 et seq.) and implementing regulations, including 14 C.F.R. Parts 21, 43, and 145. The Product holds a Technical Standard Order (TSO) authorization and may only be installed, maintained, or repaired by FAA-certificated approval holders using FAA-approved data. Per federal law, we are generally prohibited from providing schematics to uncertificated individuals for the purpose of performing repairs on the Product, as doing so would facilitate non-approved maintenance in violation of federal airworthiness requirements. Under conflict preemption principles, a state law cannot compel conduct that would undermine compliance with a comprehensive federal regulatory scheme. Moreover, the Product is also a radio frequency transmitter regulated under the Federal Communications Commission's rules for

the aviation radio service (47 C.F.R. Part 87). The FCC's authority over radio frequency equipment provides an additional layer of federal oversight that restricts our ability to facilitate the performance of repairs by non-approved individuals.

For the reasons set forth above, uAvionix is not required to make the requested information available pursuant to the law, and due to the nature of the information and requested disclosure, federal law prohibits the requested disclosure. Therefore, for safety and legal reasons, we are unable to fulfill your request as submitted.

We take our legal obligations seriously and have reviewed this matter carefully. This letter is not intended to be a complete statement of all applicable legal grounds and is provided without waiver of any rights or defenses. Should you have further questions, please contact the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read "Benjamin Morse".

Benjamin Morse, Esq.
Counsel
uAvionix Corporation
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