



November 20, 2019

Ms. Juliana P. Blackwell  
Director, Office of National Geodetic Survey  
National Ocean Service  
National Oceanic and Atmospheric Administration  
c/o  
NGS Feedback  
NOAA/NOS/National Geodetic Survey  
1314 East-West Hwy Rm9340 N/NGS1  
Silver Springs, MD 20910

Dear Ms. Blackwell:

In response to your request for comment regarding the Deprecation of the United States (U.S.) Survey Foot we would like to offer the following for consideration:

1. Having consistent weights and measures is a fundamental for interstate and intrastate commerce.
2. Arizona has current legislation stipulating the meter to foot relation as 0.3048 meters per foot, (also known as the "international foot").
  - a. ARS-33-132 <https://www.azleg.gov/ars/33/00132.htm>
3. Arizona intends to keep this foot definition in future updates of State statutes for the forthcoming 2022 geodetic modernization efforts happening at the national and State level.
4. All of the neighboring U.S. States currently use the "U.S. survey foot", making Arizona an island surrounded by dissimilar linear unit States. This has caused confusion on innumerable projects and collaborative efforts over the decades that the two foot definitions have been in place.
5. Arizona would like to strongly encourage the National Institute of Standards and Technology and the National Geodetic Survey (NGS), National Ocean Service (NOS), National Oceanic and Atmospheric Administration (NOAA), Department of Commerce (DOC) to:
  - a. Support a single definition of the foot in the U.S.
  - b. Utilize the 0.3048 meter to foot definition

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Fondren".

Mike Fondren, RLS  
Arizona Professional Land  
Surveyors, Chair

A handwritten signature in blue ink, appearing to read "Brian S. Fisher".

Brian S. Fisher, RLS  
Arizona State Geodetic Coordinator  
National geodetic Survey

A handwritten signature in blue ink, appearing to read "Gene Trobia".

Gene Trobia  
Arizona Geographic Information  
Council, Chair