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March 11, 2013

Mr. Gary A. Norek
Docket Operations, M-30
U.S. Department of Transportation
1200 New Jersey Avenue SE, Rm W12-140
West Building Ground Floor
Washington, D.C. 20590-0001

Re: Notice of Proposed Rulemaking, Proposed Modification of Dallas/Fort Worth Class B
Airspace Area; TX: Docket No. FAA-2012-1168, Airspace Docket No. 07-AWA-3

Mr. Norek,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Notice of Proposed Rulemaking (NPRM) for the Modification of the Dallas/Fort Worth (DFW) Class B airspace area. AOPA sees additional opportunities for refinement including an area where compression may result in safety concerns over Addison Airport (ADS), the need for additional Visual Flight Rules (VFR) transition options and reconsideration of varying floor heights.

Issues over Addison Airport Need to be Addressed

ADS is a critical airport supporting the greater metropolitan Dallas area. As such, it is a popular landing facility for both local and transient pilots. Unfortunately, lowering the Class B floor over ADS compresses an already confined airspace area. ADS is located at an elevation of 644 feet mean sea level (MSL). The lowered floor in proposed Area F shelf would leave only 1,900 feet of useable airspace between ADS and the overlying Class B area. Of particular concern is the impact of the compression on arriving visual and instrument traffic. In addition, the lack of visual landmarks to clearly identify Area F could lead to inadvertent airspace incursions. AOPA would suggest the FAA consider preserving the current 3,000 foot MSL floor over ADS.

Additionally, there is an inherent conflict of airspace created by lowering the Class B floor to 2,500 feet MSL as the ADS Class D ceiling is currently at 3,000 feet MSL, while the NPRM mentions lowering the Class D ceiling via a separate action, AOPA would urge the FAA to examine and address this issue prior to implementation of any airspace changes. Airspace conflicts such as this create the possibility of unintentional airspace incursions and as such, safety of flight issues.

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Varying Floor Heights Raises Potential for Incursions

With proposed floor heights of different altitudes in several areas, the potential for airspace violations and incursions becomes extremely high. Limiting the amount of varying floor heights over proposed areas D, F, I and J would mitigate pilot confusion and ensure pilots are able to transition the airspace area with greater ease.

VFR Transition Alternatives Needed

VFR transition routes represent an important tool for both Air Traffic Controllers (ATC) and general aviation, as they allow VFR pilots to navigate through the Class B airspace without adding additional burden to the controller workload and predictable routing for the pilot. While AOPA understands the establishment of transition routes would not officially be part of the Class B airspace modification, this is an opportunity to retain efficiency, safety and access for all operators and we urge the FAA to include them in the overall redesign of DFW's Class B airspace. As in other regions, the establishment of a local working group may assist the FAA in exploring these options and AOPA stands ready to assist in this process as needed.

Summary

Portions of the proposed Class B airspace modifications are concerning and need to be mitigated. AOPA encourages the FAA to reconsider varying floor heights across the Class B area and to consider VFR transition alternatives. In doing so, the FAA will ensure the most effective, efficient and safe modification to the DFW Class B airspace area. Thank you for the opportunity to submit comments on the NPRM.

Sincerely,



Melissa McCaffrey
Senior Government Analyst
Air Traffic Services