



421 Aviation Way
Frederick, Maryland 21701

T. 301-695-2000
F. 301-695-2375

www.aopa.org

December 17, 2014

Mr. Robert J. Schaefer
Commissioner of Aviation & Transportation
Town of Islip
Long Island MacArthur Airport
100 Arrival Avenue
Ronkonkoma, NY 11779-7398

Dear Commissioner Schaefer;

Thank you for your letter of September 29th regarding our inquiry and comments pertaining to modifications to the landing fee rates and collection process at Long Island MacArthur Airport (ISP).

We certainly can understand the desire of the airport and town to show the airport as a good neighbor. Having lived on Long Island in the past and flown into and out of ISP, I fully understand the impact the airport has on the local community.

While AOPA understands that the current requests to limit nighttime operations by the town are on a voluntary basis, the town and airport in the past have a history of seeking ways to limit nighttime operations using an economic disincentive model. In 2001, AOPA filed a complaint with the Federal Aviation Administration (FAA) regarding a town of Islip ordinance modification to Islip town Code Chapter 3F which implemented a \$50,000 departure fee for operations between 11 pm and 6:30 am. As a result of that ordinance, the FAA notified the town they were in violation of the Airport Noise and Capacity Act of 1990 (ANCA) and would lose eligibility for federal airport development funds if the ordinance remained in place. The ordinance was ultimately rescinded.

It is our view that recent changes to the landing fee at ISP and the increased value collected for aircraft operations between 11 pm and 6:30 am continues this economic disincentive model by placing a larger financial burden on those wishing to use the airport between those hours. It is our strong belief that this disparity in rates is a violation of federal grant assurances. In preliminary discussions with the FAA Compliance Office in Washington, DC, they share our concern.

Your response letter indicates that the airport "has not arbitrarily imposed this landing fee as due diligence on our behalf was carried out prior to the implementation ..." We would be interested in receiving additional details of what that due diligence included.

Additionally, we have found in the past that landing fees at general aviation airports that do collect landing fees, and that is only a handful, do not have a higher fee for late night to early morning operators. Most of these fees are the same rate regardless of time of day.

In closing, we would again ask that the town reconsider the application of landing fees under the modified program which went into effect on September 1, 2014 and reinstate an exemption for based aircraft. We also ask the town normalize and eliminate the differences between the fee based on time of day. Additionally, we look forward to receiving the answers to the questions posed above.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Dunn", with a long horizontal flourish extending to the right.

Bill Dunn
Vice President
Airport Advocacy