



Aircraft Owners and Pilots Association
421 Aviation Way
Frederick, Maryland 21701

www.aopa.org

August 29, 2014

Clark Desing, Manager
Operations Support Group, Western Service Center
Federal Aviation Administration
1601 Lind Ave SW
Renton, WA 98057

Re: Case No. 14-AAL-12NR Decommissioning Bettles MALSR

Dear Mr. Desing:

The Aircraft Owners and Pilots Association (AOPA) is a membership organization representing almost 400,000 pilots and aircraft owners across the nation. We would like to offer the following comments regarding the proposal to decommission the Medium Intensity Approach Lighting System with Runway Alignment Indicator Lights (MALSR).

AOPA opposed decommissioning the Bettles MALSR, at this time, for the following reasons:

Regional role of the Bettles Airport:

The Bettles Airport serves in a variety of capacities in the Alaskan aviation system. It provides direct access to the residents, businesses and government entities that live or operate in the local area. While the Bettles population is small, the community is not on the road system, thus relies on air transportation on a year around basis. While an ice road is often constructed in late winter, and connects to the Dalton Highway, it is seasonal in nature.

Bettles is also the jump off point for the Gates of the Arctic National Park and Preserve, an 8.2 million acre area. Air carrier operators bring visitors, government officials and others to Bettles, often operating Instrument Flight Rules (IFR) aircraft, which often then transfer to float, wheel or ski equipped aircraft to access the park and other lands in the central Brooks Range. Bettles also serves as a base for aerial photography, data collection operations, as well as a station for fire-fighting aircraft as needed.

Bettles plays a major role by providing an alternate airport for aircraft flying between Fairbanks and Barrow, or other Brooks Range/North Slope destinations. It is virtually the only IFR airport along this 436 nautical mile route which has IFR approaches, weather reporting, fuel and other infrastructure to support stranded travelers, and as such is important as a regional facility. While located in a continental climate zone, the area is subject to IFR conditions both from mountain weather related conditions, and from forest fire smoke during the summer, when IFR access becomes very important. While designed to support IFR operations, the MALSR lighting system are also provide a safety benefit to Visual Flight Rules pilots when needing to find the airport in marginal weather and smoky conditions.

Better approaches needed

The Federal Aviation Administration (FAA) has already removed the Localizer approach, leaving the airport with two RNAV and a VOR/DME approach, with visibility minimums of one mile or higher. The Alaska Department of Transportation and Public Facilities, the owner of the Bettles Airport, has contracted to have an airport survey conducted. When completed, the survey data

should allow the FAA to determine if the airport will support an LPV approach, and to evaluate the benefits of the MALSR lighting systems toward achieving lower approach visibility minimums. Until that analysis has been completed, AOPA requests that the FAA suspend consideration of this decommissioning proposal.

The remoteness of this airport and lack of other facilities in the central Brooks Range area makes this airport far more valuable to the Alaskan aviation system than the population of the community would appear to warrant. Given the availability of fuel, weather reporting, and other facilities, it is important to improve the infrastructure at Bettles, and not to further diminish it. We look forward to the results of the airport survey and evaluation of suitability for better WAAS approaches, to provide improved service to the general aviation and commercial aviation community.

Thank you for the opportunity to comment on this plan.

Sincerely,

A handwritten signature in black ink that reads "Tom George". The signature is written in a cursive, flowing style.

Tom George, Alaska Regional Manager