



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, Maryland 21701-4798

Telephone (301) 695-2020 • FAX (301) 695-2375

---

**Phil Boyer**

President

August 16, 2005

Honorable Marion Blakey  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

**Re: FAA Flight Plan 2006-2010**

Dear Administrator ~~Blakey~~ Blakey:

On behalf of over 406,000 members, the Aircraft Owners and Pilots Association (AOPA) submits the following comments to the Federal Aviation Administration's (FAA) *Revised Flight Plan 2006-2010*. While the FAA has incorporated many of AOPA's previous recommendations, there are several areas that are important and must be addressed in the 2006 version.

#### **General Aviation Safety**

In covering the successes of 2004, the FAA should highlight the long-term safety improvements of general aviation nationwide (not just Alaska). This includes acknowledging the 10-year trend, which shows a 25 percent decrease in general aviation accidents nationwide. Last year represented the lowest number of accidents and the lowest accident rate since 1938. It was the lowest number of fatal accidents and the second-lowest fatal accident rate. The FAA working in partnership with the general aviation community has achieved much of the safety improvements.

As the draft plan explains, the FAA-General Aviation community partnership of the General Aviation Joint Steering Committee (JSC) is critical. The safety initiatives, and the partnership garners strong general aviation community support, and ultimately result in strategies that are successful and cost effective.

The FAA's efforts to implement Wide Area Augmentation System (WAAS) instrument approaches are another initiative that improves safety. WAAS enables every runway to have vertically guided approaches, and with careful planning many airports can have unprecedented all-weather access, improving pilots' ability to land in poor weather. However, the future of WAAS implementation and availability is limited by the current airport design criteria that establish standards requiring construction of taxiways, or requirements for clear zones that are beyond the capability of many general aviation airports to meet. The FAA should consider how the design criteria for airports that are not certificated under Federal Aviation Regulation Part 139 and thus incompatible of airline operations, can be modified to accept the enhanced safety benefit available through a WAAS approach.

In addition, the FAA should emphasize long term airport planning and designate Airport Improvement Plan funding for WAAS approaches and related infrastructure revisions and enhancements.

### **Capacity**

As we have written in previous comments, the FAA is doing an excellent job of protecting airports across the country by holding communities accountable for keeping the airport open and available to all users. This must continue to be a major role of the FAA as pressures to close general aviation airports located in metropolitan areas increases. If some of the projections for expanded use of general aviation become reality, access to non-air carrier airports is essential to the success of the growth.

### **FAA Funding Issues**

AOPA does not agree with the overall contention that the funding system is "broken." While the Flight Plan document does not directly state that the current Congressional Appropriations process using taxes on users and revenues from the nation's taxpayers for FAA funding should be replaced with a "user fee" funded system, it certainly lays the groundwork. It is imperative that the FAA looks at its costs and identifies ways to reduce the amount needed to provide services.

As the Flight Plan correctly states, the modernization of the nation's Flight Service Station (FSS) system is important in improving the distribution of weather, security and flight plan information to the nation's pilots. This effort is also saving \$2.2 billion over ten years. However, the FAA should also outline how the FAA and the industry are working together to eliminate redundant navigational aids, such as approaches for 216 Non Directional Beacons that saves nearly \$5 million per year. This illustrates the way the partnership between the general aviation community and the FAA should function in identifying more efficient ways to provide services. This should be a key element of the Flight Plan.

### **Security Issues**

The Flight Plan must include the severe impact airspace security restrictions have on general aviation operations and the air traffic control system. While we know that the FAA does not control security issues, the Agency cannot continue ignoring its affect on the aviation system. For example, the more than 200 Temporary Flight Restrictions issued during 2004 related to travel by the President and Vice President impacted pilots across the country. This is dwarfed by the Washington DC Air Defense Identification Zone that continues to adversely affect pilots, airports, aviation businesses and the air traffic control system in the national capitol region.

The FAA is *the* Government agency that AOPA members rely on to disseminate aviation related security information. General aviation pilots need the FAA to provide airspace limitations and disseminate information in a timely fashion. It is a requirement that has not been adequately addressed. We note that the FAA will attempt to improve the U.S. Notice to Airmen (NOTAM) system. Other initiatives are also needed, and we recommend developing a strategy with the users.

Honorable Marion Blakey  
August 16, 2005  
Page 3

The FAA's strategies in "International Leadership" do not address an important general aviation issue related to aeronautical charts. Late last year, claiming bi-lateral contract constraints and security issues, the Department of Defense (DOD) proposed to terminate the dissemination of flight-critical international charts and data. Citing member needs AOPA strongly objected but the DOD decision still looms. The FAA should address this by making a commitment to establish bilateral agreements with other air traffic service providers to obtain the aeronautical data, which eliminates reliance on the DOD. With bilateral agreements in place, aeronautical data could be available from the FAA.

Thank you once again for providing AOPA with the opportunity to share the general aviation perspective on your Flight Plan 2006-2010. We believe that general aviation will continue to grow each year, while improving safety and operating with national security concerns in mind. With the improvements and additions recommend by AOPA, the FAA will be properly focused on fulfilling its mission.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Boyer", written over the word "Sincerely,".

Phil Boyer  
President