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July 6, 2006

Manager
Air Traffic Western Terminal Service Area
Federal Aviation Administration
P.O. Box 92007
Los Angeles, CA 90009-2007

Re: Proposed Phoenix, AZ Class Bravo redesign and AOPA's alternative proposed changes

The Aircraft Owners and Pilots Association (AOPA), on behalf of more than 408,000 members nationwide and more than 11,000 in the State of Arizona, submits the following comments in response to the proposed changes to the Phoenix, Arizona Class Bravo airspace area. AOPA supports lowering the ceiling of the airspace from 10,000 feet to 9,000 feet mean sea level (msl). However, we are concerned with the overall complexity of the changes and oppose lowering the floor of the airspace in numerous areas where commercial traffic arriving into Phoenix Sky Harbor International Airport (PHX) is currently contained within the existing airspace structure. After being presented with the concerns of the Phoenix Terminal Radar Approach Control (TRACON) facility and reviewing air traffic data tapes of live PHX traffic, AOPA offers the following comments and proposed alternative changes.

Ad hoc Process Flawed

Based on Federal Aviation Administration (FAA) Order 7400.2F, Procedures for Handling Airspace Matters, section 15-3-3, AOPA served as a member of the ad hoc advisory committee tasked with providing recommendations to the FAA regarding the proposed PHX Class B changes. Unfortunately, the recommendations presented by the users during the 14 months of advisory committee meetings yielded very little change to the "straw man" Class B proposal as presented by the FAA at the public meetings. In our experience, the PHX advisory committee process was flawed, in that the PHX did not incorporate user recommendations into its proposal and is a less than a stellar example of collaboration on proposed Class B changes, which did not produce effective results.

PHX Proposal too Complex

The overall complexity of the proposed PHX redesign presents increased risk of safety challenges and operational errors. In fact, the FAA appropriately requires that Class B

airspace be as simple as possible with a minimum amount of sub-areas (FAA Order 7400.2F section 15-2-3). While the purpose of Class B airspace is for the containment of instrument operations to a major airport, the needs of the surrounding general aviation (GA) and user community must also be taken into consideration during the design process. Considering the majority of GA operations are single pilot operations, workload or cockpit resource management is a constant safety consideration. Complex airspace designs like that proposed for Phoenix, force pilots to constantly change altitudes when circumnavigating the Class B airspace due to multiple sub areas and result in the compression of visual flight rules (VFR) traffic into congested areas or in the case of the proposed changes, into airspace over designated wilderness to the east side of the valley.

With this in mind, the proposed design created by Phoenix TRACON is needlessly and overly complex. While AOPA appreciates the TRACON's efforts to keep the floor of the airspace as high as possible in certain areas, the effect is an airspace with far too many sub-areas, often with boundaries that are not based on ground reference points or an electronic navigation aid. As the attached graphic shows, the entire west side of the Phoenix Class B can be divided into three progressively lower floors. This alternative design continues to allow for GA transitions but offers a simpler, less complex configuration and more than makes up for the small amount of airspace pilots may have gained in the TRACON design. The same is true with the shelves immediately north and south of PHX and the floor north of Scottsdale Airport (SDU).

AOPA Supports Proposed Ceiling Changes

AOPA fully supports lowering the ceiling from the current 10,000 feet to 9,000 feet msl. This giveback of 1,000 feet will allow the option of transient overflights in an airspace area currently not being utilized by the TRACON for PHX arrivals and departures. AOPA applauds the FAA for returning this airspace to the National Airspace System (NAS), which provides a great benefit to the overall user community. At the same time, we appreciate the facilities willingness, at the request of the ad hoc user working group recommendation, to enter into a Letter of Agreement (LOA) with the local glider community to enable continued glider operations from 9,000 to 10,000 feet msl. This proposed change allows a win-win situation for all users in the Phoenix airspace area.

East Valley Airspace Flawed

AOPA is opposed to lowering the floor of the Class B sector over the East Valley area from the current 8,000-foot floor down to 5,000 feet msl. The TRACON's proposed floor of 5,000 feet extending to 25 nautical miles will not only severely hamper GA's

ability to transition the Phoenix airspace to the east but is being proposed to allow PHX arrivals to descend lower on visual approaches to parallel downwinds – the very scenario that when educating the surrounding Phoenix communities, the FAA claimed would NOT OCCUR.

Between the Superstition Mountains to the east and the Falcon Field (FFZ) Class D to the west, there is literally nowhere for GA pilots to transition on the East side of PHX. And just as the TRACON and ATC heard repeatedly in the public airspace meetings and acknowledged during a telcon with AOPA in early May, the lack of GA services available from the Phoenix TRACON makes it impossible to transit within the Class B airspace area. Furthermore, the TRACON's proposal will not permit GA pilots to fly at least 2,000 feet over the Superstition Mountains Wilderness Preserve, which would be against FAA's very own guidance as spelled out in Advisory Circular, AC 91-36. AOPA recommends raising the floor to 7,000 feet to accommodate the arrivals into PHX and allow for GA transitions underneath the Class B airspace area as well.

If the FAA is to maintain integrity throughout the airspace redesign process, they must be forthright and upfront with the non-flying public regarding the current altitudes and future intended flight altitudes of the PHX arrivals over the East Valley. The FAA should notify the public of the intent to lower the air carrier arrivals over the East Valley with a visual approach descent profile at 5,000 feet when 25 to 30 nautical miles away from PHX, rather than utilizing the higher descent profiles contained in the current instrument approach procedures.

Simplify East Flyway and Surface Area Boundary

In order to keep the Class B design simple and maintain the integrity of the necessary VFR flyway on the east side of Sky Harbor, AOPA recommends a number of minor changes to the TRACON's proposal on the east side. The current proposal has four different floor altitudes in the few miles between Falcon Field and PHX. In addition, lowering the airspace to 2,700 feet, in combination with an expanded Class B surface area, constrains the highly popular and necessary VFR flyway. As shown in the attached graphic, AOPA recommends leaving the Class B surface boundary at Dobson Road and the east side of the sub-area at Gilbert Road, and slightly altering the Falcon Field Class D to conform to Gilbert Road. Since the majority of pilots who use the flyway are local to the Phoenix area, the use of these prominent roads as boundaries is appropriate. The addition of a waypoint could be added over Gilbert road if the use of the road is causing confusion for air carrier pilots on their visual approaches into PHX.

As was discussed on the telcon with the TRACON and in multiple ad hoc meetings, if the altitude must be lowered 300 feet to eliminate the "alerts" the air carriers are receiving on arrivals into Sky Harbor rather than for containment purposes, the adjacent sector must

remain as large as possible in order to allow safe use of the flyway. Also, the very small sub-area that lies between Gilbert Road and the 10 distance measuring equipment (DME) arc is much too complex and unnecessary. GA pilots gain no benefit from having a higher floor in this area. In fact, the loss of lateral airspace to transition on the flyway would be a major impact to GA.

VFR Flyway and Transition Route Modifications

While there has been mention of maintaining the east flyway between PHX and FFZ, there is a much greater need for additional work on the VFR flyways and transition routes in the Phoenix Class B airspace area. Based on the controversy surrounding the current TRACON design, the ad hoc group did not provide recommended changes to the flyway or transition routes. However, AOPA recommends that the ad hoc working group revisit these much needed flyways and transition routes once the Class B design has incorporated and taken into account the recommendations provided by Phoenix users during the scoping process.

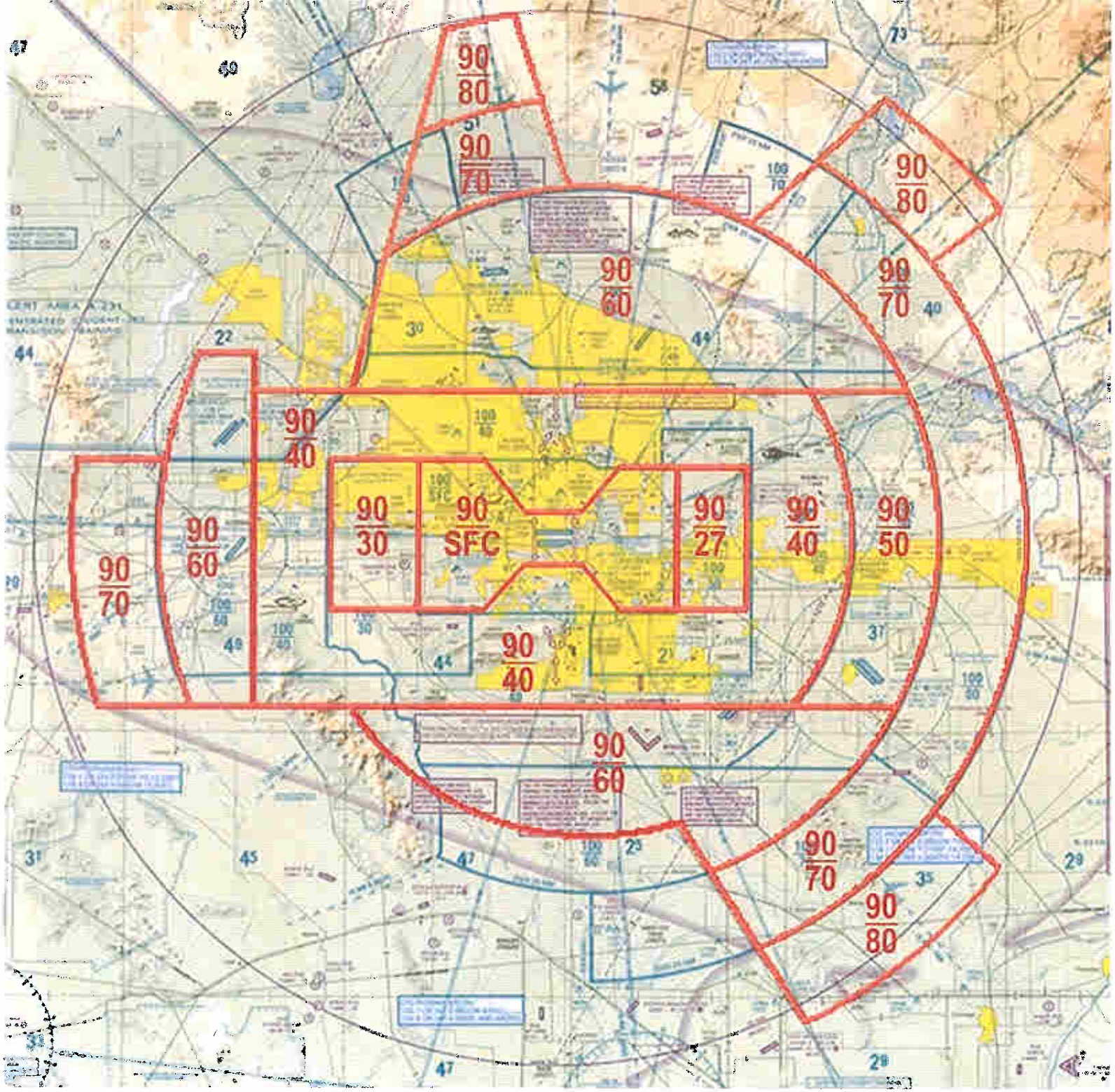
In light of area navigation (RNAV) technology and satellite based equipment that many aircraft are already taking advantage of, it would be beneficial for the TRACON and the FAA to develop RNAV procedures in and around PHX that could be utilized to more efficiently allow for arrival and departure flows as well as terminal transition routes that would benefit the GA community.

While AOPA appreciates the challenges of redesigning the Class B airspace area, the current proposed design is much too complex and does not take the overarching needs of Phoenix airspace users into account. With such an active GA community in the greater Phoenix area, it is imperative that the redesign appropriately addresses the needs of that large user community. AOPA looks forward to working with the TRACON in the future to modify the proposed Class B redesign.

Sincerely,

Heidi Williams
Director
Air Traffic Services

Attachment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