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Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590-0001

RE: FAA Docket No. FAA-2005-20700 and Airspace Docket No. 04-AWA-8

The Aircraft Owners and Pilots Association (AOPA), representing over 404,000 general aviation pilots nationwide, opposes the revocation of Class D airspace and subsequent establishment of a Class C airspace area as proposed in the Notice of Proposed Rulemaking (NPRM) for Sanford International Airport (SFB), FL. AOPA contends that the designation of Class C airspace around SFB will not fully address the concerns put forward by the facility but will increase cost and inefficiencies for local general aviation airspace users. AOPA is not opposed to the proposed changes to the Orlando Class B airspace, as it will result in improved general aviation access in the airspace area D.

Sanford has stellar safety record

According to the NPRM, runway incursions resulting from diverting the controller's attention, delays and frequency congestion are cited as reasons for the change to Class C. While AOPA recognizes the importance of reducing runway incursions, Sanford currently has an enviable runway incursion record. According to data provided by the Office of Runway Safety, SFB had three incursions in 1999, two incursions in 2000, and none from 2001-2002. All incursions were classified as "D" meaning they had little to no chance of collision and typically separation is not lost. While Sanford experienced a total of four surface incidents in 2002-2003, all but one was caused by pilot error. Their average surface incursion rate for those two years was only .548 incidents per 100,000 operations, which is slightly better than the national average and certainly does not warrant the need for Class C airspace.

The FAA should pursue non-rulemaking alternatives to Class C airspace. For example, to address the safety and controller workload concerns, the FAA should adjust Sanford tower staffing to facilitate improved air traffic and runway safety. In addition, modifications to the Class B for Orlando International airport (MCO) or the Class D at SFB could eliminate the concern of operations on a final approach for SFB being contained beyond the four-mile final. Offloading the sequencing of SFB arrivals to the MCO approach control would also reduce the burden of arrival sequencing responsibilities. This could be done via a letter of agreement rather than by rulemaking to implement additional airspace. As cited in the NPRM, non-rulemaking options that provide for an acceptable level of safety must be implemented prior to rulemaking

being initiated. While AOPA recognizes arrival flows have been coordinated with local flight schools and larger arriving aircraft into SFB, AOPA contends that additional measures could be implemented between the air traffic facilities that may prove Class C airspace is not warranted.

FAA did not follow ad hoc user group process

According to the NPRM, the Federal Aviation Administration (FAA), incorrectly states that they formed an ad hoc airspace advisory committee that included AOPA. Contrary to the pre-NPRM public input, it is AOPA's understanding the FAA policy prohibits the sponsorship of such a committee and in fact, the FAA may only act in an advisory capacity to an ad hoc committee and cannot initiate or host the committee. In the case of this airspace action, AOPA was invited and participated in only one meeting to discuss the airspace proposal at which point we raised serious concern with the ad hoc process and how it was being handled in Orlando. While it is true that the FAA held three meetings to discuss the airspace proposals, the Agency did not follow the ad hoc user group process and no formal record of recommendations was provided. Furthermore, when the public scoping meetings were announced, the FAA experienced a major snag in mailing distribution of the meeting announcements that resulted in AOPA having one-day advanced notification of the public meeting dates. The Association again raised the concern as many members contacted us after the fact to let us know they had not been made aware of the public meetings and did not have the opportunity to attend.

While AOPA agrees that issues were raised and addressed at the three meetings that proved beneficial, the three meetings did not follow the long-standing ad hoc process that AOPA and FAA worked so diligently to establish.

Based on the issues discussed at the 2003 public meetings and the comments provided during this NPRM comment period, it is clear that local users have not been adequately consulted during the development of the SFB Class C airspace or modifications to the MCO Class B airspace. Early and meaningful involvement of the local airspace users via the ad hoc user group process is a critical element in the development of successful airspace changes that work for both air traffic control and users of the airspace.

ATC staffing and operational concerns

Although the NPRM asserts that staffing levels at the facilities is adequate to handle the modifications of MCO Class B and designation of Class C at SFB, based on the diversion of resources at SFB, it seems apparent that staffing at that facility is not meeting the current operational demands. Further evidence is needed to support the assertion that staffing levels are adequate and why an airspace change is necessary to offload sequencing of arrivals to Orlando approach to assist in handling the demand.

While SFB meets the enplanements needed to qualify for a Class C airspace designation, enplanements alone do not tell the complete story. In light of the current air carrier climate and Delta Airlines recent filing of bankruptcy, AOPA contends that operations at SFB are likely to

decline in the near future. Evidence of that decline is available upon reviewing the operational counts reported to FAA through September 2005, at SFB. The number of operations at SFB is down significantly from the same time period in 2003 or 2004. AOPA is concerned that the operations do not justify the need for Class C airspace. Enplanements alone do not account for the demand or capacity placed on the facility. In light of the fact that SFB already falls below the threshold of operations for a Class C facility and operations continue to decline, the establishment of Class C airspace appears unwarranted.

In conclusion

AOPA supports the proposed modifications to the MCO Class B to coincide with construction and implementation of the MCO fourth runway. Specifically, the addition of airspace to the north of Orlando Executive airport (ORL), as described by Area D, will allow additional flyway airspace for transiting aircraft under the floor of the Class B airspace area. AOPA also supports the cutout of airspace for Cedar Knoll Flying Ranch Airport (01FL) to the east of SFB.

However, AOPA does not support the revocation of the Class D and establishment of Class C airspace at SFB. We contend that pre-NPRM collaboration with the users of the impacted airspace was not collaborative and did not follow the ad hoc process as agreed to by FAA and AOPA. AOPA strongly encourages the FAA to revisit the airspace user group process under the direction of the Florida Department of Aviation if future consideration of the Sanford Class C proposal were pursued.

AOPA appreciates the opportunity to provide input and comments on this proposal and looks forward to working with the FAA to address the remaining concerns of the pilots in and around the Sanford/Orlando, FL area.

Sincerely,



Heidi J. Williams
Director
Air Traffic Services

cc: Ms. Edie Parish, Manager Air Traffic and Rules