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December 7, 2012

Mr. Gary A. Norek
Docket Operations, M-30
U.S. Department of Transportation
1200 New Jersey Avenue SE, Rm W12-140
West Building Ground Floor
Washington, D.C. 20590-0001

RE: Notice of Proposed Rulemaking, Proposed Modification of Class B Airspace; Las Vegas,
NV: Docket No. FAA-2012-0966; Airspace Docket No. 12-AWA-5

Mr. Norek,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Notice of Proposed Rulemaking (NPRM) for the Modification of the McCarran International Airport's (LAS) Class B airspace. AOPA is concerned with portions of the proposed modification to the LAS Class B airspace and believes that there is an opportunity for refinement. Of greatest concern is the increase to the Class B ceiling height and the associated impacts that this will have on efficiency and airspace access for general aviation.

FAA Outreach Efforts Need to be Updated

AOPA appreciates the efforts that the Federal Aviation Administration (FAA) has made constructing www.lasvegasclassbravo.org, but it is disconcerting that there have not been updates since the NPRM was published in October. In hopes that this great resource for pilots will not be lost and that the public is accurately informed, we implore the FAA to update the site to reflect the details of the NPRM. These efforts will assist the flying public in understanding the full scope of and reasons for the proposed changes. With education and outreach in mind, AOPA encourages the FAA to consider similar websites for future Class B modifications and ensure they are updated on a regular basis.

Request for Comment Period Extension

In light of the fact that the NPRM comment deadline falls between two federal holidays and www.lasvegasclassbravo.org has not been updated to reflect new information about the NPRM, AOPA is requesting an extension of at least 30 days to the comment period. With no submission to the federal docket to date, we are concerned that there is a correlation between the lack of comments and the lack of information provided on the FAA website. This extension will allow AOPA to further communicate information about the NPRM to our membership and provide

additional time for our members and the general public to review the NPRM during a busy holiday season. The extension would also provide additional time for members of the public to draft and submit substantive comments on the NPRM, which is the goal of the public comment period.

Raised Ceiling Unjustified

The NPRM proposes raising the upper limit of the Class B airspace to 10,000 feet Mean Sea Level (MSL). We disagree with the NPRM's assessment that the raised ceiling and other changes will have a 'minimal impact'. This increased ceiling will greatly decrease Visual Flight Rule (VFR) pilot's ability to overfly the Class B airspace thus requiring them to circumnavigate airspace potentially 60 Nautical Miles (NM) in diameter.

Furthermore, this increase in ceiling comes with no clear justification. The NPRM claims the intent of the increased ceiling is to decrease Traffic Collision Avoidance System (TCAS) advisories for inbound aircraft particularly around Victor airways V-21 and V-394. From the information provided, it appears these conflicts are often between aircraft both of whom are in contact with Air Traffic Control (ATC) and thus raising the ceiling would not solve the issue. If the concern is with VFR traffic transiting V-21 and V-394 above 9,000 feet MSL a unilateral expansion of the entire Class B airspace to 10,000 feet is not very effective. A more viable alternative would be to raise the Class B ceiling only where needed or alter the routes available for transition on V-21 and V-394. In so doing, the FAA will ensure containment and separation without substantially impacting general aviation traffic outside those two areas of concern.

The FAA has stated that the increased ceiling height will permit greater airspace to accomplish sequencing, later application of speed control, and easier airspace for Visual Flight Rules (VFR) aircraft to identify. While AOPA understands ATC's desire for more airspace to increase flexibility in sequencing and speed control, the FAA must understand that such an expansion of Class B airspace will substantially decrease flexibility, efficiency, and safety for general aviation aircraft operating outside of the Class B boundaries. Piston powered aircraft are significantly impacted by density altitude constraints. Any increase to the Las Vegas Class B ceiling height will limit the number of aircraft able to climb over the Class B, and will substantially increase the time, expense, and fuel required in doing so.

Access through Class B airspace

While we appreciate the establishment of new VFR waypoints to assist general aviation aircraft transitioning around the Class B airspace, there is still a real need for access through the Class B airspace area which may be met through the establishment of a VFR transition route.

Understanding that the establishment of a transition route would not be officially part of the Class B airspace modification, AOPA sees this as an opportunity to retain efficiency, safety and access for all operators. The exact location of the transition route should allow for routine and consistent availability of the route.

Summary

While AOPA appreciates efforts to modify parts of the proposed redesign, additional mitigation needs to occur. There appears little need to uniformly raise the ceiling of the Class B airspace to

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10,000 feet MSL. Keeping the current ceiling altitude or raising it only where necessary, will go far in maintaining the general aviation community's ability to conduct operations in and around the Las Vegas Metropolitan Area. AOPA encourages the FAA to mitigate these areas of concern to ensure the most effective, efficient and safe modification to the Las Vegas Class B airspace area. Finally, we would strongly encourage the agency to extend the current public comment period by 30 days to ensure adequate time for public comment is offered during a busy holiday season and in light of up to date web resources that currently exist.

Thank you for the opportunity to submit comments on the NPRM for the Las Vegas Class B airspace area.

Sincerely,

A handwritten signature in black ink that reads "Melissa McCaffrey". The signature is written in a cursive style with a large, stylized 'M' and 'C'.

Melissa McCaffrey
Senior Government Analyst
Air Traffic Services