



421 Aviation Way  
Frederick, Maryland 21701

T. 301-695-2000  
F. 301-695-2375

[www.aopa.org](http://www.aopa.org)

March 22, 2013

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 Amendment of Class C Airspace; Nashville, TN; Docket No. FAA-2013-0031; Airspace Docket No. 12-AWA-7

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 amendment of the Nashville International Airport (BNA) Class C airspace. AOPA is concerned the Federal Aviation Administration (FAA) has not provided justification for increasing the size of the Class C surface area.

**Class C expansion should be based on need**

The NPRM proposes to modify the BNA Class C airspace area by removing a cutout from the surface area that was in place to accommodate operations around Cornelia Fort Airpark Airport (M88) which is now closed. The proposal appears to reclassify Class C airspace to a standard configuration while providing no justification the additional airspace grab is needed or justified. The National Airspace System (NAS) is a finite resource and reconfiguring airspace to adapt to a particular standard without justification does not seem the most efficient or best use of our limited airspace resources.

**Summary**

At a time when we are all working to be good stewards of the NAS, AOPA would encourage the FAA to maintain the current cutout northwest of BNA unless justification can be provided that dictates an actual need for additional Class C airspace. Retention of this airspace as currently charted allows greater options for aircraft transitioning the BNA Class C while meeting the current need for Class C airspace around Nashville. Thank you for the opportunity to submit comments on the NPRM.

Sincerely,

Melissa McCaffrey  
Senior Government Analyst  
Air Traffic Services