



50 F St. NW, Suite 750
Washington, D.C. 20001

T. 202-737-7950
F. 202-273-7951

www.aopa.org

March 7, 2016

Mr. Frank Hatfield
Director, System Operations Security
Federal Aviation Administration
800 Independence Avenue S.W.
Washington, DC 20591

Dear Mr. Hatfield:

On behalf of our members, the Aircraft Owners and Pilots Association (AOPA) would like to request the Federal Aviation Administration (FAA) establish policies and procedures for general aviation (GA) aircraft to obtain an airspace waiver for certain operations within the Temporary Flight Restrictions (TFRs) detailed in NOTAM FDC 4/3635. AOPA is a not-for-profit individual membership organization representing the interests of nearly 400,000 pilots and aircraft owners nationwide. AOPA's mission is to effectively serve the interests and needs of its members as aircraft owners and pilots and establish, maintain, and articulate positions of leadership to promote the economy, safety, utility, and popularity of flight in general aviation aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization in the world.

As you are aware, the TFR over Disneyland (Anaheim, CA) is located between the Los Angeles Class B and the Santa Ana Class C airspace, which is one of the busiest and most complex sections of airspace in the country. Maneuvering through this busy airspace while remaining clear of the TFR can be challenging and creates additional operational safety risks by requiring aircraft to fly in close proximity to approach/departure paths of nearby commercial service airports.

NOTAM FDC 4/3635 includes provisions for granting waivers or exemptions for flights "authorized by air traffic control (ATC) for operational or safety purposes." However, current waiver procedures only cover operations relevant to the park and require verification that the flight is for an operational function of the venue. The waiver process needs to be expanded to include a way to capture operations that, under the determination of the FAA, could be conducted safer if allowed to operate within the TFR.

AOPA requests that the FAA implement policies and procedures that would allow general aviation aircraft to obtain an airspace waiver for certain operations, such as conducting aerial survey and photography, within the TFR defined by NOTAM FDC 4/3635.

Thank you in advance for your support and welcome the opportunity to provide additional information and input. We appreciate your continuing efforts to improve safety.

Sincerely yours,

Nobuyo A. K. Sakata
Director, Aviation Security