



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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September 14, 2007

Mr. Thomas C. Accardi
Director of Aviation System Standards
6500 South Macarthur Blvd
Oklahoma, OK 73169-6901

Re: Proposed Cancellation of 254 Instrument Approaches

Dear Mr. Accardi:

On behalf of more than 413,000 members, the Aircraft Owners and Pilots Association (AOPA) reviewed the Federal Aviation Administration's (FAA) proposal to cancel 254 instrument approaches that were announced in July 2006. AOPA opposes the cancellation of 83 instrument approaches, including three approaches that appear to eliminate all instrument access to airports, 36 approaches that require Global Positioning System (GPS) or Distance Measuring Equipment (DME) equipment to access the airport, 12 where all GPS approaches would be eliminated, and 30 approaches that result in the elimination of straight-in minimums to the airport. Although, AOPA strongly supports the FAA's efforts to transition the National Airspace System (NAS) to satellite based navigation, and understands the need to eliminate redundant and unnecessary approaches, many of the proposed cancellations could have a significant impact on general aviation operations.

Using the list of approaches provided by the FAA, AOPA has evaluated each one, and invited members to comment on the proposal. As a general comment, AOPA opposes any approach cancellation that eliminates GPS access to a runway end. Even if there are other GPS approaches to an airport, the continued promotion of GPS for all future navigation requires that the FAA preserve and improve upon the existing level of GPS approaches.

AOPA conducted a detailed analysis of the approaches, and we use color-coding to highlight 81 that have a significant affect on general aviation operations. Due to the negative affects the proposed approaches have on all users (including GPS users), AOPA recommends the following FAA actions for each category of impact.

- **Publish ground based and GPS approaches before eliminating the approaches that end IFR services at three general aviation airports.** AOPA research reveals that Cuba, Missouri; Harvard, Nebraska; and Southampton, New York all will lose instrument access unless the FAA publishes new approaches first.

- **Retain the 36 ground based approaches where GPS or DME would now be required.** Loss of these approaches negatively impacts all users, including those equipped with GPS. For the pilots without DME or GPS, pilots will be forced to choose between new equipment investments, or increased risks associated with marginal visual flights. General aviation aircraft owners are extremely cost sensitive and they may not invest in either a GPS or DME system. Therefore, pilots may decide to fly under marginal visual conditions in lieu of instruments. AOPA has historically advocated for maximum access to instrument procedures so that pilots have the option of instrument access, and are not forced to operate in marginal conditions, which often times is more hazardous. Loss of non-GPS approaches at these airports also negatively impacts GPS users because the airports would no longer be eligible as an alternate airport. Current FAA policy prohibits GPS-only airports as an alternate unless the aircraft is equipped with a certified Wide Area Augmentation System (WAAS) navigator. With fewer than 15,000 aircraft equipped with WAAS, the remaining 50,000 aircraft equipped with certified non-WAAS GPS will be forced to select other airports that have a non-GPS approach as an alternate. A change in FAA policy could alleviate the impact on GPS users.
- **Establish a straight-in, stand alone GPS approach before eliminating the 10 approaches that also eliminate all IFR GPS access.** The loss of overlay approaches reduces the users ability to maximize their investment in GPS, and reduces their incentives to transition from traditional ground based navigation.
- **Publish alternate ground-based and GPS approaches with straight-in minimums before canceling 30 approaches that now leave the airport with only a circling approach.** Although AOPA believes that the circling to land approaches generally provide benefits that are worth their retention, AOPA opposes an increase in the number of airports where no straight-in GPS approach is available, and circling is now required. Accident data reveals that circling to land approaches are less safe than straight-in. Forcing users to accept straight-in access, as their only option is unacceptable.

AOPA also received numerous comments from AOPA members with the same concerns expressed above. However, multiple members expressed strong concerns about the loss of approaches due to their utilization for flight training purposes, and overall safety, including the following airports:

- **KTRK (Truckee, CA).** As in 2006, members recommend that the FAA should add more approach options for KTRK, not remove the existing approaches. Numerous members expressed concerns with regards to the cancelled approach in lieu of the remaining approach from a safety standpoint. Local weather patterns and general aviation piloting techniques suggest that the approach needs to be

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retained. AOPA also notes that the KTRK airport needs to be evaluated for instrument approaches in general. Relying on one remaining approach leaves pilots with few tactical choices in what appears to be a very hostile terrain and weather environment.

- **KGXY (Greeley, CO).** Multiple members commented that the proposed cancellation eliminates the only NDB approach for miles around. They question this strategy.

AOPA appreciates the ongoing dialogue with the FAA on the nation's general aviation airport approach services. A transition to satellite navigation is underway and where possible, the FAA should eliminate redundant or unnecessary approaches. However, as we have outlined above, certain approaches do not meet this criteria and should be retained.

Sincerely,



Andrew V. Cebula
Executive Vice President
Government Affairs

Enclosure

	Airport	City	State	Arpt ID	Procedure	Impact Statement
1	Cuba Muncpal	Cuba	MO	UBX	NDB-A	IFR
2	Harvard State	Harvard	NE	O8K	VOR/DME RNAV or GPS RWY 35	IFR
3	Southampton	Southampton	NY	B7N	COPTER VOR/DME RNAV or GPS 187	IFR
4	Hope Muni	Hope	AR	M18	NDB RWY 16	DME or GPS
5	Castle	Atwater	CA	MER	VOR/DME RWY 13	DME or GPS
6	Truckee-Tahoe	Truckee	CA	TRK	VOR/DME RNAV or GPS-A	DME or GPS
7	Naples Muni	Naples	FL	APF	VOR RWY 05	DME or GPS
8	Charlotte County	Punta Gorda	FL	PGD	VOR RWY 03	DME or GPS
9	Lagrange-Callaway	La Grange	GA	LGC	VOR/DME RNAV or GPS RWY 31	DME or GPS
10	Washington Muni	Washington	IA	AWG	VOR/DME RNAV or GPS RWY 31	DME or GPS
11	Ann Arbor Muni	Ann Arbor	MI	ARB	VOR RWY 06	DME or GPS
12	Wexford County	Cadillac	MI	CAD	NDB RWY 25	DME or GPS
13	Grand Haven Memorial Airpark	Grand Haven	MI	3GM	VOR-A	DME or GPS
14	Tulip City	Holland	MI	BIV	VOR-A	DME or GPS
15	East Kansas City	Grain Valley	MO	3GV	VOR/DME RNAV RWY 27	DME or GPS
16	M. Graham Muni	Point Lookout	MO	PLK	VOR/DME RNAV or GPS RWY 29	DME or GPS
17	Curtis L. Brown Jr. Field	Elizabethtown	NC	EYF	NDB RWY 33	DME or GPS
18	Harnett County	Erwin	NC	HRJ	NDB RWY 23	DME or GPS
19	Gastonia Muni	Gastonia	NC	AKH	NDB RWY 03	DME or GPS
20	Rockingham Countv NC Shiloh	Reidsville	NC	SIF	NDB RWY 31	DME or GPS
21	Searle Field	Ogallala	NE	OGA	VOR RWY 08	DME or GPS
22	Searle Field	Ogallala	NE	OGA	VOR RWY26	DME or GPS
23	Sidney Muni/Lloyd W. Carr Field	Sidney	NE	SNY	VOR RWY 12	DME or GPS
24	Sidney Muni/Lloyd W. Carr Field	Sidney	NE	SNY	VOR RWY 30	DME or GPS
25	Raton Muni/Crews Field	Raton	NM	RTN	NDB RWY 02	DME or GPS
26	Lt. Warren Eaton	Norwich	NY	OIC	VOR/DME RNAV or GPS RWY 19	DME or GPS
27	Greater Portsmouth Regional	Portsmouth	OH	PMH	VOR/DME RNAV or GPS RWY 18	DME or GPS
28	Watonga	Watonga	OK	JWG	NDB RWY 17	DME or GPS
29	West Woodward	Woodward	OK	WWR	NDB RWY 17	DME or GPS
30	Rafel Hernandez	Aguadilla	PR	BQN	VOR RWY 08	DME or GPS
31	Aiken Muni	Aiken	SC	AIK	NDB RWY25	DME or GPS
32	Marlboro County-Jetport-H.E. Avent Field	Bennettsville	SC	BBP	NDB RWY06	DME or GPS
33	Cheraw Muni/Lynch Bellinger Field	Cheraw	SC	CQW	NDB RWY26	DME or GPS
34	Mt Pleasant Regional-Faison Field	Mount Pleasant	SC	LRO	VOR/DME RNAV or GPS RWY 17	DME or GPS
35	Bay City Muni	Bay City	TX	BYY	NDB RWY 13	DME or GPS
36	New Braunfels Muni	New Braunfels	TX	BAZ	VOR/DME RNAV RWY 31	DME or GPS
37	Monroe Muni	Monroe	WI	EFT	VOR/DME RNAV or GPS RWY 12	DME or GPS
38	Portage Muni	Portage	WI	C47	VOR/DME RNAV or GPS RWY 17	DME or GPS
39	Montgomery Field	San Diego	CA	MYF	NDB/DME or GPS RWY 28R	GPS
40	Decorah Muni	Decorah	IA	DEH	VOR/DME RNAV or GPS RWY 29	GPS
41	Amelia Earhart	Atchison	KS	K59	VOR/DME RNAV or GPS RWY 16	GPS
42	Southwest Michigan Regional	Benton Harbor	MI	BEH	NDB or GPS RWY 27	GPS
43	Anoka County-Blaine (Jane Field)	Minneapolis	MN	ANE	VOR/DME RNAV or GPS RWY 18	GPS
44	Dubois-Jefferson Countv	Dubois	PA	DUJ	VOR/DME RNAV or GPS RWY 07	GPS
45	RWJ Airpark	Baytown	TX	54T	VOR/DME RNAV RWY 26	GPS
46	Cleburne Muni	Cleburne	TX	CPT	VOR/DME RNAV RWY 15	GPS
47	Cleburne Muni	Cleburne	TX	CPT	VOR/DME RNAV RWY 33	GPS
48	Campbell Countv	Jacksboro	TN	JAU	VOR/DME RNAV or GPS-A	GPS
49	Marion County Regional	Flippin	AR	FLP	VOR/DME RNAV or GPS RWY 22	Circling
50	Chester	Chester	CT	SNC	VOR/DME RNAV or GPS RWY 17	Circling
51	Chester	Chester	CT	SNC	VOR/DME RNAV or GPS RWY 35	Circling
52	Cornelius-Moore Field	Cedartown	GA	4A4	VOR/DME RNAV or GPS RWY 10	Circling
53	Cornelius-Moore Field	Cedartown	GA	4A4	VOR/DME RNAV or GPS RWY 28	Circling
54	Winder-Barrow	Winder	GA	WDR	VOR/DME RNAV or GPS RWY 23	Circling
55	Fort Madison Muni	Fort Madison	IA	FSW	VOR/DME RNAV or GPS RWY 16	Circling
56	Fort Madison Muni	Fort Madison	IA	FSW	VOR/DME RNAV or GPS RWY 34	Circling
57	Pekin Muni	Pekin	IL	C15	VOR/DME RNAV or GPS RWY 09	Circling
58	Putnam County	Greencastle	IN	417	NDB RWY 18	Circling
59	Kentland Muni	Kentland	IN	50I	VOR/DME RNAV or GPS RWY 27	Circling
60	Dowagiac Muni	Dowagiac	MI	C91	VOR/DME RNAV or GPS RWY 27	Circling
61	Menominee-Marinette Twin County	Menominee	MI	MNM	VOR/DME RNAV or GPS RWY 21	Circling
62	Saint Claire County IntI.	Port Huron	MI	PHN	VOR/DME RNAV or GPS RWY 22	Circling
63	Paul C. Miller-Sparta	Sparta	MI	8D4	VOR/DME RNAV or GPS RWY 24	Circling
64	Faribault Muni	Faribault	MN	FBL	VOR/DME RNAV or GPS RWY 12	Circling

