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October 1, 2009

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

Re: Proposed Cancellation of 154 Instrument Approaches

Dear Mr. Accardi:

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of more than 415,000 pilots. 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.

On behalf of more than 415,000 members, AOPA has reviewed the Federal Aviation Administration's proposal dated July 02, 2009 to cancel 154 instrument approaches procedures. AOPA strongly opposes the cancellation of 22 out of the 154 approaches and files comments on behalf of our members to assist the FAA in analyzing 21 additional approaches. Additionally, AOPA is unclear of the FAA's intent on 3 approaches. 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, several 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. AOPA conducted a detailed analysis of the approaches and the results are categorized below.

Additionally, AOPA spoke to numerous airport managers about the proposed cancellations and none of them had yet received notification from the FAA of the proposed cancellations. The FAA may not yet have begun this outreach effort, but AOPA would like to comment that this effort is vital and should be implemented well before any final decisions are made on the proposed cancellations. Also, AOPA has not yet seen the proposals circulated in the federal register and would like to ensure this process is followed.

## VOR/LOC Access to Airports Would Be Eliminated

The proposed cancellations would eliminate IFR access to 16 airports for aircraft that are not equipped with DME, GPS, or ADF. While many of the airports do have alternate ILS or VOR procedures, in many cases these procedures require GPS, DME, or ADF. Losing these procedures would negatively impacts all users, including those equipped with GPS. Pilots without DME, GPS, or ADF would 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 choose not invest in either a GPS or DME system. Therefore, these pilots may decide to fly under marginal visual conditions in lieu of IFR. 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 often hazardous marginal conditions. 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. The FAA's 2005 Equipment Survey of General Aviation Aircraft states that less than 11,000 aircraft are equipped with WAAS, leaving more than 58,000 IFR GPS equipped aircraft with no other option but to select from other airports that have a non-GPS approach as an alternate. While AOPA acknowledges that more aircraft are now equipped with these technologies, we rely on the FAA's statistically accurate information for our evaluation and comments. A change in FAA policy could alleviate the impact these requirements place for selecting alternates has on GPS users.

As a general comment, AOPA opposes the cancellation of any approach that would remove VOR access to an airport or add GPS, DME, or ADF equipage requirements.

AOPA opposes the cancellation of the following 16 approaches because they would eliminate VOR access to 16 airports for aircraft that are not GPS, DME, or ADF equipped.

<u>Airport</u>	<u>Additional equipment that would be required</u>	<u>Additional Comments</u>
KBEC	GPS or DME	AOPA received comments that many of the aircraft on this field are not GPS equipped and therefore would lose IFR access to the airport.
KCVO	GPS, DME, or ADF	
KDBN	GPS or NDB	AOPA received comments that many of the aircraft on this field are not GPS equipped and therefore would lose IFR access to the airport as well as an added level of safety the approach provides.
KEKO	GPS or DME	
KELO	GPS	

KHWD	DME or GPS	AOPA received a large number comments from users that are concerned with the proposed cancellation because this approach is still utilized and its cancellation would remove IFR access to the airport for aircraft only equipped with VOR equipment. The approach is also used for training purposes and on practical flight tests.
KIRK	GPS or DME	AOPA received comments from members concerned that IFR access to the airport will be lost for those that are only VOR equipped.
KMLC	GPS, ADF, or DME	AOPA received comments from members that would lose IFR access to this airport if the VOR-A is removed because their aircraft are not GPS or DME equipped.
KMSS	GPS or ADF	
KOLS	DME, GPS, or ADF	AOPA received comments from members specifically concerned about removing VOR access to an airport that is located in challenging terrain and also located near the border.
KONP and KOTH	GPS, DME, or ADF	AOPA received comments from members that are very concerned about the potential loss of this approach. This is a coastal airport that often has IMC. Additionally, this approach serves as a safe backup in case the ILS fails. These members were concerned that there are few coastal airports in Oregon with instrument approaches and losing both this approach and the approach at KOTH could create a safety problem for coastal route flights in non-GPS equipped aircraft.
KPRB	GPS or DME	AOPA opposes the decommissioning of both of these approaches. AOPA received comments from a large number of concerned members about the proposed decommissioning of two approaches at KPRB. Additionally, AOPA received a copy of the comments from the airport manager at KPRB that will be filed with the FAA, and we strongly support the request to retain the VOR/DME or GPS-B procedure. Members noted that this airport is geographically diverse from many other airports in the area and when others are completely fogged in often the weather at KPRB allows the airport to be used as a safe alternate. Many aircraft often divert to KPRB for this reason. Members noted that the VOR/DME-B is the primary approach for aircraft arriving from the south, the LA Basin area, and account for a large percentage of their traffic. Removing this approach would add 15-20 minutes of flight time and add additional expenses and fuel burn to many flights. As there is no approach control or tower serving PRB, Oakland center must handle each approach one at a time. If both approaches were canceled and each approach were to take 15-20 more minutes, the ability to efficiently conduct operations for Oakland could be dramatically reduced. Several members noted that the remaining approaches require GPS or DME, and AOPA strongly supports that VOR only access to this airport is maintained. Members also noted that due to sparse population and high terrain in the area, many flights at night are conducted under IFR to increase safety. At night, the winds at KPRB often favor RWY 31, making the VOR/DME approach a straight in and the preferred

		approach.
KRDM	GPS or DME	
KRKS	GPS or DME	AOPA received comments from members that would like the VOR-A retained. This approach is the only VOR approach that generally lines pilots up for runway 36. The only other non-GPS approach for this airport serves RWY 18.
KWJF	GPS	
M83	DME or GPS	AOPA does not object to the removal of the GPS-A, but members specifically requested that the VOR-A approach be retained.

It is vital to maintain VOR/LOC IFR access to these 16 airports. While the general aviation community is adopting the use of GPS, we are not yet midway through this transition with only 26% of the general aviation fleet equipped with IFR approach capable GPS units. As almost all general aviation aircraft that operate IFR are VOR equipped, retaining a vital infrastructure of VOR accessible airports is necessary for maintaining a high level of safety and efficiency in the NAS until more aircraft are equipped with IFR approach capable GPS units.

AOPA also received numerous comments from members that have not adopted IFR GPS because the expense of maintaining a current database is too high. In order to continue the transition to a satellite based navigation system, electronic navigation data necessary for instrument flight needs to be provided to all users of the National Airspace System at an affordable cost. AOPA encourages the FAA to continue efforts to populate their National Flight Database into a robust, low cost database option that will translate into a low cost solution for consumers.

Lastly, a very large number of concerns were voiced concerning potential problems with the Global Positioning System and constellation, some of which are addressed in the May 2009 GOA report GPS: Significant Challengers in Sustaining and Upgrading Widely Used Capabilities. Comments were also received with concerns about maintaining a backup system for GPS. In light of these concerns and the lack of an identified backup for GPS, it is vital that the FAA maintain an adequate ground based infrastructure, including the VOR network, in the near to mid-term.

Local Needs Necessitate Maintaining Approach

AOPA opposes the cancellation of the following 6 instrument approaches at 5 airports and encourages the FAA to consider member comments regarding 6 other airports based on local needs and procedures.

3CK	Comments were received that this is the airport's only approach from the south and southwest, the direction from which most traffic is coming, and that local weather conditions often make this approach the only safe choice without greatly increasing pilot workload. Due to 3CK's proximity to the large airports KORD and KPWK, and
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	<p>their arrival corridors, extensive vectoring is often needed for the airport's other approaches. The VOR-A allows more direct transitions and hence reduces workload for pilots and ATC in this congested area. The VOR-A approach also allows aircraft to land on RWY 26 without having to fly in or around the Chicago Class B to transition for the approach. Commenters also noted that the set up for procedure often allows pilots to cancel IFR upon reaching visual conditions and before beginning the approach. This could lead the FAA's tracking of the actual utilization of the approach to create an inaccurate picture of the safety and efficiency this approach provides for 3CK and the area's traffic flow.</p> <p>Additional comments were received stating that this approach allows pilots to stay much higher until being established on the descent due to the Chicago airspace, thus providing a higher level of safety than other approaches to the airport.</p> <p>AOPA opposes the cancellation of the VOR-A procedure at 3CK.</p>
KAUW	<p>AOPA received comments from members supporting the NDB or GPS-B approach. This approach course places a pilot within 10 degrees of the runway 30 and provides a 1780' MDA. The airport's VOR or GPS-A approach to this runway places the pilot on a nearly 40 degree intercept and has a 1840' MDA (60' higher).</p> <p>AOPA opposes this cancellation and would like to see an RNAV approach developed to runway 4 before cancellation of the NDB GPS is again considered.</p>
KGAI	<p>AOPA was contacted by numerous members and the airport manager concerning the cancellation of this approach. Many members based at this airport utilize this approach, including several operators of large aircraft that significantly contribute to the airport's financial self sufficiency. Additionally, this airport is located in the Washington DC Special Flight Rules Area (SFRA). The VOR 14 approach at the airport can take pilots into the Flight Restricted Zone (FRZ) if they are not cautious, and therefore some local pilots prefer the NDB approach. Comments were also received regarding this usefulness of this approach as a training aid. There are not any other NDB's located nearby.</p> <p>AOPA opposes the cancellation of the NDB RWY 14 procedure at KGAI.</p>
KASH	<p>AOPA supports the comments filed by Daniel Webster College and requests that the FAA retain the VOR or GPS-A approach at KASH to support their flight training operations and prevent a negative impact on flight training costs.</p> <p>AOPA also opposes the cancellation of the VOR or GPS-A approach because it allows for continued efficiency for aircraft arriving from the north and northeast.</p>
KABI	<p>AOPA received a number of comments from members regarding the cancellation of the VOR and NDB approaches at ABI. They state that many flight schools in the area, as well as numerous military aircraft, heavily rely on these approaches daily for flight training. The VOR-A is used often and allows for easy transitions from the north and northwest. It also allows aircraft to circle to RWY 35R, the primary GA runway, and leave the ILS for other operations as well as save flight time and reduce controller workload.</p>

	<p>One member also commented that the VOR 22 at ABI is extremely inaccurate and is a safety concern.</p> <p>AOPA opposes the cancellation of the VOR-A and NDB RWY 35R approaches.</p>
KMKG	AOPA received comments that the airport's other VOR approach places aircraft over Lake Michigan and that most pilots try to avoid this procedure due to safety concerns. The VOR-A thus provides a safe backup ground based backup for the ILS approaches.
KMUE	Comments were received that addresses that this is the only non-GPS approach to the airport from the north shore of the Big Island. This approach also serves one of only three airports on the island with instrument approaches, and the weather in this area can very rapidly change from VMC to IMC.
KRUO	AOPA received comments from members that frequently uses this approach and would like to see it maintained.
N51	AOPA received comments from members that use the VOR-A approach. They addressed that the approach provides a better option for landing on the alternate runway during a cross wind condition at the airport. Additionally, the alternate VOR RWY 4 approach has higher minimums.
KROA	<p>AOPA received comments that the VOR/DME-A approach at KROA is frequently utilized, particularly for traffic coming from the east and northeast. The ILS and LDA approaches best serve aircraft coming from the south, and canceling the VOR/DME-A would add additional time and distance for many aircraft.</p> <p>AOPA recommends that the FAA review the actual utilization of this approach before moving forward with their decision, as well as coordinate with Roanoke approach and tower to determine the additional workload this could cause for their controllers.</p>
KSFZ	Members commented that the VOR-A allows time to be saved for aircraft arriving from the southeast and the VOR-B when arriving from the north. Both save time for the pilot and controllers.
2G9	<p>AOPA received several comments opposing the cancellation of the NDB RWY 25 approach at Sumerset. This airport recently completed a runway expansion to allow more aircraft operations and support arrivals for the United Flight 93 memorial.</p> <p>Members also commented that the terrain surrounding the airport and several tall obstructions are located near the airport and the approach should be maintained for safety purposes.</p>

### Approaches Utilized For Training

AOPA received numerous comments from members with concerns about the loss approaches at the following airports due to their utilization for flight training purposes and overall safety.

KPNC	This approach is used by a large local aircraft manufacturer for FAA Industry Training Standards (FITS) programs. It allows a DME arc intercept, and the next closest approach with this procedure is located approximately 75 miles away.
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KIDP	This approach is used by a large local aircraft manufacturer for FAA Industry Training Standards (FITS) programs. As very few other NDB and approaches are in the area, AOPA recommend the FAA maintain the KIDP NDB. Additionally, the long term availability of the NDB facility is of concern due to the equipment installation and testing needs of aircraft manufacturers in the area.
KFCH	AOPA received comments from users that the flight schools based at and near KFCH extensively use the KFCH NDB approach for training and practical test purposes. Losing this approach could add costs to flight training because there are very few additional NDB approaches in northern California.
KBPT	Members commented that all of the approaches at this airport are still heavily utilized for training and should be retained.
KSLN	Kansas State University has a large flight school with 40 aircraft located at Salina. This school utilizes this approach for pilot training and AOPA recommends the FAA consider retaining this procedure.
KWJF	Comments were received from a large flight school that uses the NDB approach for IFR training. They are concerned that there are not any other NDB approaches in the area that can cost effectively be accessed for training purposes.
KCOE	Comments were received that this is one of the few NDBs in the area and it is at a low traffic airport which makes it a safe practice approach location.
KALN	Comments were received KALN offers several different approach types and this makes it a cost effective airport for instrument training. The VOR-A is one of the few in the area, and this allows various approaches to be trained at one airport, thus saving time and cost. Many flight schools in the area use this airport for this purpose including Parks College and St. Louis University.
KPIA	Comments were received stating that KPIA offers several different approach types and this makes it a cost effective airport for instrument training. Additionally, the ATC facilities in the area are able to accommodate training requests and relieve the burden from busier facilities in the area, thus enhancing safety and efficiency.
KPOU	AOPA received comments from flight instructors regarding the VOR-A approach. They stated that this approach is frequently used for training, and that it particularly makes an efficient approach. The approach can be started at the IGN VOR, which is a part of the missed procedures for the ILS RWY 6 procedure and provides an easy transition for training. This keeps the workload on the busy ATC facilities in the area as low as possible. Also, other similar approaches in the area are all in more congested airspace and located further from KPOU and other local airports.
KYNG	AOPA received comments that the VOR-A approach is often used for training by many surrounding airports including 4G1, BTP, UCP, BVI, and others.  Also, members commented that the VOR has certain radials that are unusable and may be in need of repair.
KRFI	AOPA received comments from a flight school based at the airport. The flight school uses the NDB for flight training. The members also commented that the NDB is utilized by VFR pilots as a means for locating the airport, and members are concerned that if the approach is removed the NDB will also eventually be removed.
KCJR and	The FAA is proposing to remove the NDB approach at each of these airports. These provide the only local training options for NDB flights, and AOPA has received

W45	comments from members that this change would impact their ability to stay proficient on NDB approaches. AOPA suggest that the FAA retain one of these approaches and members indicated that the KCJR approach is utilized more often.
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Unclear Intent

KGLV	NDB RWY 4	<p>The US terminal procedures do not list this approach, but AOPA assumes the FAA is referring to the NDB runway 5. If this assumption is correct, AOPA does not have any comments.</p> <p>However, if the FAA has a different intent, AOPA requests a correction and that it be re-circulated for evaluation and comment.</p>
KHYY	NDB RWY 27	<p>This procedure is not listed in the current US terminal procedures. However, it may be possible that this procedure was already cancelled. If this is correct, AOPA requests information regarding if an opportunity to evaluate this impact and file comments was provided.</p>
KHYY	NDB RWY 27	<p>This procedure is not listed in the current US terminal procedures. However, it may be possible that this procedure was already cancelled. If this is correct, AOPA requests information regarding if an opportunity to evaluate this impact and file comments was provided.</p>

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, AOPA supports the FAA’s efforts to eliminate redundant or unnecessary approaches. However, as we have outlined above, certain approaches do not meet this criteria and should be retained.

Sincerely,



Robert E. Hackman  
Senior Director  
Regulatory Affairs