



421 Aviation Way  
Frederick, Maryland 21701

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

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

June 9, 2010

Ms. Edith Parish  
U.S. Department of Transportation  
Docket Operations, M-30  
1200 New Jersey Avenue, SE.  
West Building Ground Floor, Room W12-140  
Washington, DC 20590-0001

RE: Proposed Cleveland Class B Modifications; FAA Docket No. FAA-2009-0514 and Airspace Docket No. 07-AWA-1

Dear Ms. Parish,

The Aircraft Owners and Pilots Association (AOPA), representing over 415,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) proposal to modify the Cleveland-Hopkins International Airport (CLE) Class B airspace in Cleveland, OH. Overall, AOPA supports the proposed modifications and offers one recommendation to further enhance safety and access of the CLE Class B airspace area.

AOPA appreciates the common sense approach the FAA has adopted to include only that airspace required for containment of arrivals and departures from CLE. Arbitrarily expanding the vertical or lateral dimensions to conform to a prescribed standard would not be in the best interest of safety or meet the needs of airspace users. AOPA also applauds the FAA's efforts to address and mitigate concerns raised by general aviation pilots regarding access to airports affected by the redesign.

AOPA would offer one recommendation to enhance safety and access to the CLE Class B area in the airspace north of the shoreline known as area "B". The Lake Erie shoreline represents a popular and convenient visual landmark for pilots flying east-west near CLE and the existing 1,900 foot floor of the Class B airspace to the north of the shoreline compresses general aviation traffic to critically low altitudes. AOPA recommends the FAA consider raising the portion of area "B" north of the shoreline and over Lake Erie to 3,000 feet. An alternative to raising the Class B floor could be the addition of a VFR flyway which would permit pilots to transition the area while maintaining separation from commercial traffic and reducing pilot and controller workload.

AOPA appreciates the FAA's efforts to develop a solution that equitably accommodates all segments of aviation in the redesign of Cleveland's Class B airspace. Thank you for the opportunity to provide comments on the proposed modifications to the airspace.

Sincerely,

Tom Kramer  
Manager  
Air Traffic Services