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January 10, 2011

Mr. Clark Desing
Manager, Operations Support Group
AJV-W2, Western Service Center
Air Traffic Organization
Federal Aviation Administration
1601 Lind Avenue SW
Renton, WA 98057

RE: Proposed Modification of the Seattle, WA Class B Airspace Area

Mr. Desing:

The Aircraft Owners and Pilots Association (AOPA), representing over 410,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) proposal to modify the Class B airspace over Seattle-Tacoma Airport (SEA) in Seattle, WA. Overall, AOPA supports the proposed modifications and offers one recommendation regarding the airspace change northwest of Boeing Field to further enhance the safety and access of the SEA Class B airspace area.

Lateral Dimensions and Variable Ceiling Height

AOPA appreciates the common sense approach the FAA has adopted to include only that airspace required for containment of arrivals and departures from SEA. 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 supports the consideration given to a variable ceiling-height over SEA. Although it is unconventional, this design meets the goals of Class B airspace by containing arriving and departing traffic at SEA while simultaneously increasing the efficiency for general aviation aircraft operating over and around the Class B airspace. In lowering the ceiling height, more aircraft will be able to utilize the area above the Class B airspace resulting in reduced congestion beneath the floor of SEA's Class B.

Class B Expansion to protect arrivals to Boeing Field

While we appreciate the tailored approach taken on the redesign of Seattle's Class B airspace area, we cannot support the 2,000 foot to 10,000 foot sector northwest of SEA. According to FAA sources, this sector was added to contain aircraft arriving at Boeing Field (BFI) which is currently classified as Class D airspace. During a recent review of the Class D airspace around BFI in early 2010, no effort was made to expand or modify the boundaries to contain aircraft arriving at BFI. Using Class B airspace to contain arrivals at a secondary Class D airport is a misuse of Class B airspace. The FAA has not provided any data that demonstrates an existing safety or operational need that could only be addressed with Class B airspace in this area. No pilot outreach or education has occurred to address a safety concern in this area, and no consideration for a less restrictive airspace, such as Class D, was considered prior to proposing Class B airspace. We request that the 2,000 to 10,000 foot sector northwest of SEA be removed from the design modification.

Mr. Clark Desing

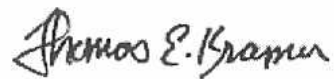
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Summary

AOPA appreciates the FAA's efforts to develop a solution that equitably accommodates all segments of aviation in the redesign of Seattle's Class B airspace. We request that the FAA remove the 2,000 to 10,000 foot sector northwest of SEA due to lack of demonstrated need and non-standard use of Class B airspace. Thank you for the opportunity to provide comments on the proposed modifications to the airspace.

Sincerely,

A handwritten signature in black ink that reads "Thomas E. Kramer". The signature is written in a cursive, slightly slanted style.

Tom Kramer

Manager

Air Traffic Services