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March 16, 2011

Mr. Mark D. Ward
Manager, Operations Support Group
Eastern Service Area, Air Traffic Organization
Federal Aviation Administration
P.O. Box 20636
Atlanta, GA 30320

Re: Proposed modifications to Philadelphia's Class B airspace area

Mr. Ward,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) plan to modify the Philadelphia International Airport's (PHL) Class B airspace boundaries. The FAA's current design appears to be overly complex with multiple floors and sectors which will degrade situational awareness and may lead to an airspace incursion. Portions of the expansion appear to be excessive and do not serve to contain aircraft arriving or departing from PHL, the primary purpose of Class B airspace. AOPA contends that the alternative approach outlined below will allow the FAA to maintain containment of arrivals within the Class B airspace with much less impact on the operations at the surrounding airports and Visual Flight Rules (VFR) operations in the area.

Complexity of design
AOPA members have expressed significant concern with the complexity of the design of the proposed PHL Class B airspace. A successful Class B design balances the need for simplicity with the need for access in the vicinity of Class B airspace. While we appreciate the FAA's efforts to minimize the impact on general aviation through multiple cutouts and division of sectors, it has resulted in a design with multiple hotspots that are likely to result in pilot confusion, frustration, and inadvertent airspace incursions.

There are four hotspots in the FAA's proposed design (refer to Figure 1) that could lead to inadvertent confusion and a potential incursion. These areas contain airspace corridors or sectors as little as one nautical mile wide. The boundaries of these sectors do not appear to follow any traditional convention such as prominent landmarks or Very High Frequency Omnidirectional Range (VOR) radials and will be nearly impossible for pilots to identify. In Figure 2, AOPA suggests a design that would eliminate these hotspots while still meeting the FAA's containment goals.

Expansions for containment only
It appears the FAA is requesting more airspace be designated as Class B than is actually needed to address an issue of safety or containment. Philadelphia International Airport operates on a mainly northeast/southwest axis. Graphics provided by the FAA during the ad hoc process depicted the vast majority of traffic arriving at PHL would be contained within small extension areas to the northeast and southwest. There is no need to extend the outermost ring of the Class B airspace uniformly around the entire perimeter. Doing so will unnecessarily increase the size of the Class B without an accompanying increase in containment, safety, or efficiency. Such a move would not fit with the FAA's stated goal of using the least restrictive form of airspace possible.

The United States Air Force's (USAF) 305th Air Mobility Wing has expressed concerns with the eastward expansion of Class B airspace into Alert Area A-220. This expansion will force a significant amount of VFR traffic, circumnavigating the PHL Class B airspace, through the McGuire Alert Area. AOPA shares the Air Mobility Wing's concern for the impact on midair collision avoidance in this area due to airspace compression. With the Base Realignment and Closure process, McGuire Air Force Base is expected to see a significant increase in flight operations from their current level, compounding the compression issue.

AOPA proposes that the 20-24 nautical mile ring be removed and replaced with Class B extensions extending to the northeast and southwest to contain arrivals currently exiting the Class B in these areas. To further mitigate the impact on VFR operators outside of Class B as well as the USAF use of the Alert Area east of PHL, AOPA requests that the FAA retain the existing easternmost boundary of the PHL Class B until reaching the southern portion of the extension (refer to Figure 2). AOPA's suggested modifications meet the goal of containment within the Class B airspace while minimizing the impact on general aviation traffic and the USAF operations in Alert Area A-220.

Summary
The multiple sectors and various floor heights create an overly complex Class B airspace area that pilots will find difficult to transit and which may lead to inadvertent airspace incursions. Portions of the expanded Class B airspace do not appear to serve a containment, safety, or efficiency purpose and should be removed to mitigate the impact on general aviation and USAF operations in Alert Area A-220. The attached figures illustrate AOPA's suggested modifications to the FAA's current design.

Thank you for the opportunity to submit comments on the proposed modifications to the Philadelphia Class B airspace area.

Sincerely,

Tom Kramer
Manager
Air Traffic Services

Figure 2

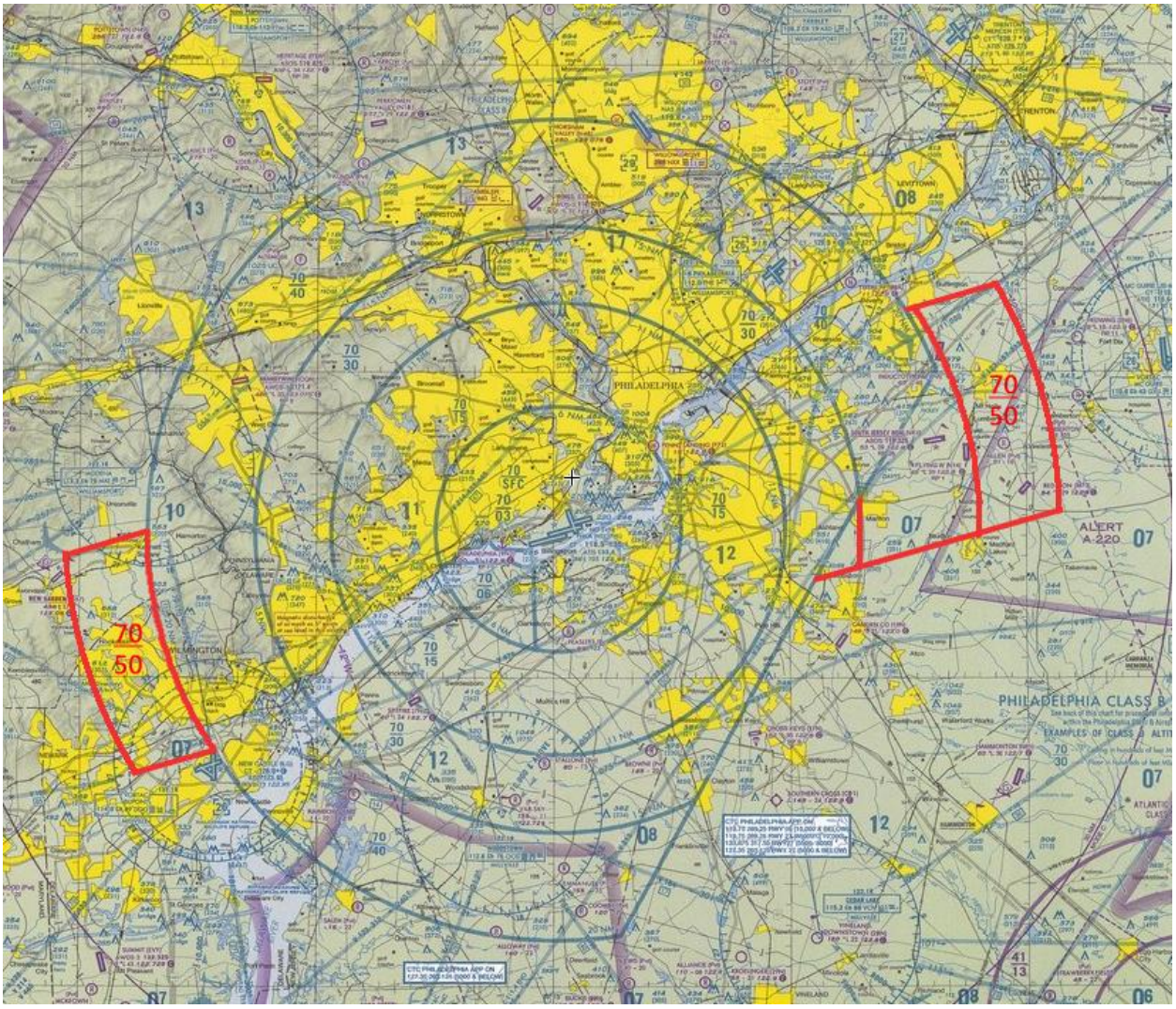
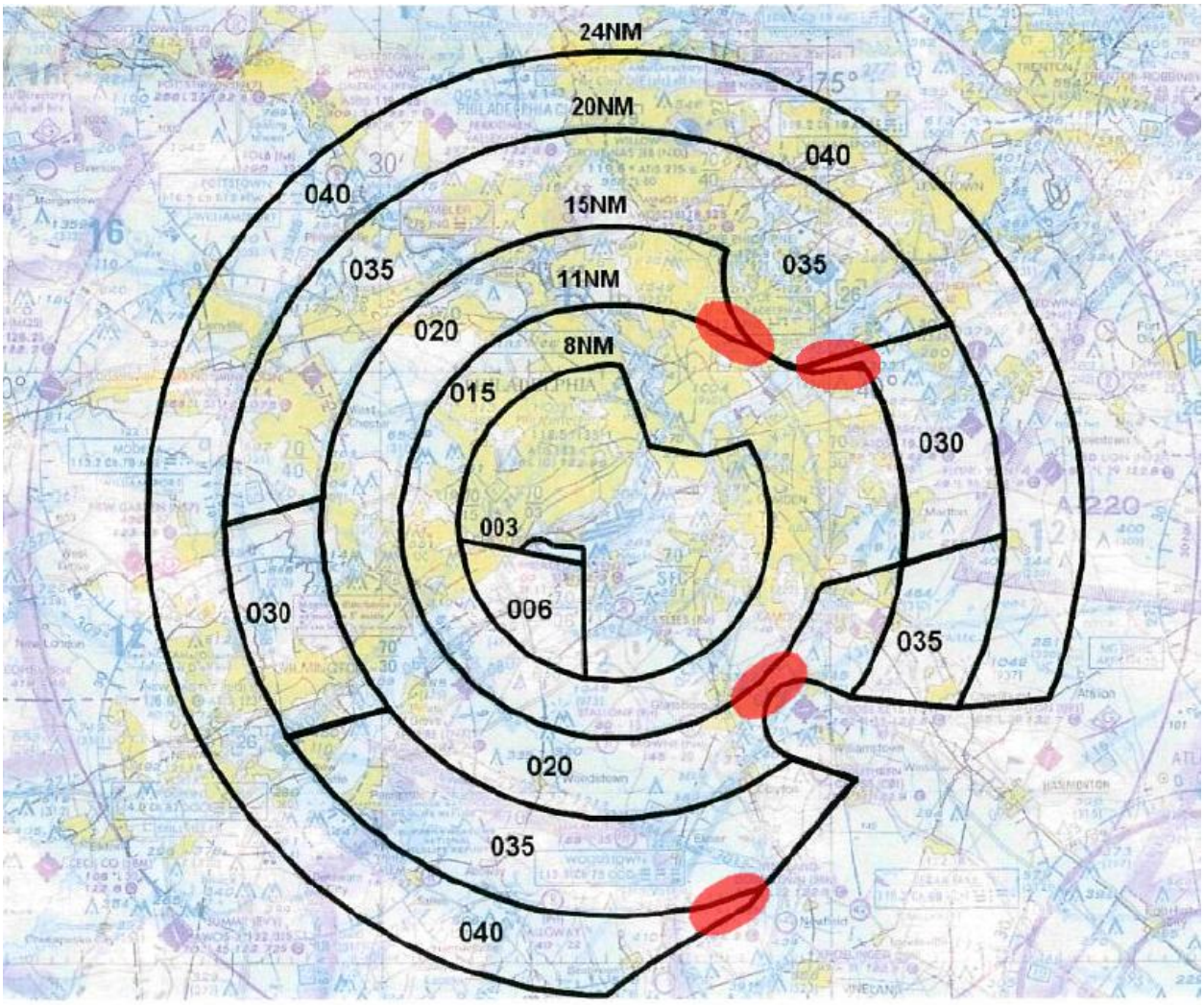


Figure 1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