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Mr. John Warner
Manager, Operations Support Group
Western Service Center, Air Traffic Organization
Federal Aviation Administration
1601 Lind Avenue, S.W.
Renton, WA 98057

Re: Proposed Modification of the Las Vegas, NV Class B Airspace Area

Mr. Warner,

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) proposed modification of the Las Vegas, NV Class B airspace area. AOPA appreciates the FAA's effort in creating a dedicated website to provide information on the proposed modifications. However, AOPA is concerned with portions of the proposed modifications to the Las Vegas Class B airspace. Of greatest concern is the potential increase to the Class B ceiling height and the associated impacts that will have on efficiency and airspace access for general aviation. AOPA recommends a number of alternatives below that could help mitigate the impacts on the general aviation community.

FAA Outreach Efforts
AOPA appreciates the outreach and education efforts the FAA has made with the Las Vegas Class B modification effort. In particular, the website, www.lasvegasclassbravo.org, has been extremely helpful for pilots who want to understand the full scope of and reasons for the proposed changes. AOPA recognizes that providing detailed information about proposed modifications well in advance of the informal airspace meetings will lead to more efficient meetings and more substantive comments resulting in a more effective process and better end product for all parties involved. AOPA requests that the Las Vegas Class Bravo website be updated to reflect alterations made in response to comments received during the informal airspace meeting process. In addition, AOPA suggests that the FAA consider similar websites and data distribution for future Class B airspace modifications.

Alternatives to Class B Boundary Changes
Discussions during the ad hoc committee process and statements on the Las Vegas Class Bravo website reveal that many of the modifications proposed for the Las Vegas Class B airspace are a result of conflicts with the SUNST and KEPEC arrivals. For these arrivals, Air Traffic Control (ATC) routinely vectors aircraft off the arrival procedure and onto the final approach course. Recognizing the development and modification of Area Navigation (RNAV) procedures is to improve efficiency, AOPA requests that RNAV procedures be contained to the greatest extent possible within existing Class B airspace when feasible.

Increase to ceiling height
The FAA has identified two Victor airways (V21 & V394) that are potentially in conflict with arrival and departure procedures from Las Vegas Mc Carran International Airport (KLAS). While these two Victor airways do overlap arrival/departure procedures at KLAS, the FAA has not released any data that demonstrates these two areas are a safety concern. The Traffic Collision and Avoidance System (TCAS) data used as justification for raising the ceiling in relation to the conflict with V21 and V394 appears to highlight an area where all operations are in contact with ATC. This data appears to display the need for greater ATC coordination instead of justifying the need for raising the ceiling of the Bravo airspace.

The FAA is proposing a unilateral expansion of the entire Class B airspace to 10,000 feet to address two small areas of potential conflict. Such a wide scale modification may not be the most effective means of addressing a concern limited to two confined areas. A more viable alternative would be to raise the Class B ceiling *where needed*. In so doing, the FAA will ensure containment and separation without substantially impacting general aviation traffic outside those two areas of concern.

The FAA has stated that the increased ceiling height will permit greater airspace to accomplish sequencing, later application of speed control, and easier airspace for Visual Flight Rules (VFR) aircraft to identify. While AOPA understands ATC's desire for more airspace to increase flexibility in sequencing and speed control, the FAA must understand that such an expansion of Class B airspace will substantially *decrease* flexibility, efficiency, and safety for general aviation aircraft operating outside of the Class B boundaries.

Piston powered aircraft are significantly impacted by density altitude constraints. Any increase to the Las Vegas Class B ceiling height will limit the number of aircraft able to climb over the Class B, and will substantially increase the time, expense, and fuel required in doing so. The proposed Las Vegas Class B modifications include dramatic lateral expansion and lowered floors in many sectors. Combined, these changes will push general aviation aircraft closer to the mountainous terrain surrounding Las Vegas and increase the distance to circumvent the Class B airspace.

A Notice of Proposed Rulemaking was recently released for modifications to the Seattle Class B which include a variable-height ceiling. AOPA requests that the FAA evaluate the possibility of raising the Class B ceiling only in those sectors required for containment of arriving/departing traffic and for deconfliction with V21 and V394. Applying these two criteria would result in a central corridor north-south over KLAS enabling general aviation pilots to operate at 9,000 feet and above, outside of the Class B airspace.

VFR Access through Class B Airspace
Though not officially a part of the Class B airspace modification, there is an opportunity to retain efficiency, safety, and access for all operators through the establishment of RNAV T-routes through the Las Vegas Class B airspace. The most desirable location for a T-route that avoids conflict with arrival and departure procedures would run north to south on the east side of KLAS airport. The exact location of the T-route should allow for routine and consistent availability of the route.

Summary
AOPA appreciates the FAA's dedicated website highlighting the proposed LAS Class B airspace modifications. Based on the justification provided by the FAA, it appears that other, less expansive options may better accommodate the full spectrum of airspace users. In addition to considering a variable-height Class B ceiling, AOPA requests that the FAA further mitigate the impacts of an expanded LAS Class B through establishment of T-routes.

We appreciate the opportunity to submit comments on the FAA's planned modifications to the Las Vegas Class B airspace area.

Sincerely,

Tom Kramer
Manager, Air Traffic Services