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August 12, 2015

Mr. Eric Freed
Manager
Aeronautical Information Services
Enroute and Visual Charting Group
AJV-5200
Federal Aviation Administration
1305 East-West HWY
Silver Spring, MD 20910

Re: Notice of policy to discontinue the World Aeronautical Chart

Dear Mr. Freed,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation organization representing the general aviation interests of pilots and aircraft owners, submit the following comments to the Federal Aviation Administration (FAA) in regard to the notice published in the Federal Register on June 23, 2015, that the World Aeronautical Chart (WAC) will no longer be produced. Although AOPA understands the fiscal issues affecting the FAA, AOPA opposes the wholesale removal of this category of aeronautical chart which is critical to flight safety. Furthermore, we disagree with the departure from a public comment period as we believe this is a significant issue for the flying public.

After the notice was posted, AOPA sent a letter opposing the proposed action and subsequently met with Aeronautical Information Services (AIS) personnel to discuss a solution that would better allow users to comment, as well as allow WACs to continue to be published in the interim. AOPA appreciates the FAA agreeing to produce and disseminate the WACs expiring this calendar year (CF-18 and Ch-23), and we feel this extension will allow us to respond appropriately to such an important issue.

AOPA created and advertised a survey in late July requesting feedback as to the utility and utilization of WACs. There were over 740 respondents with an overwhelming majority indicating their support for and reliance on WACs for their flying and flight planning needs. The results of the survey are attached. There are likely many more pilots who did not participate in the survey who would also share this view. WACs are a unique aeronautical chart that serves many purposes so their total removal could affect flight safety, especially if an acceptable alternative was not made available.

WAC Utility and Coverage

The WACs are designed for high-performance aircraft operating under Visual Flight Rules (VFR) at high altitude, normally above 10,000' Mean Sea Level. The same level of detail is not charted on the WAC as on the sectional chart because such minute detail is unnecessary for these higher flying or faster flying aircraft; however, these charts are not limited to one clientele. Pilots

of aircraft of various performance characteristics utilize WACs for long-range or overview flight planning as a single flight may cover several sectional charts but only one WAC. In fact, 81% of respondents stated they use WACs for flight planning and 77% indicated they continue to use WACs in the cockpit. Flight planning is still routinely taught using a paper chart and the WAC offers a capability not found in other aeronautical products, nor do other charts offer the utility that WACs do in the cockpit.

There are three geographical areas where there would be a “gap” in coverage should the WAC be discontinued: the Caribbean region, Alaska, and the US/Mexico border. Should these charts be canceled, the lack of coverage in these areas could severely impact VFR flight. Specifically, there is little to no sectional chart overlap with: CH-25, CJ-26 and CJ-27 in the Caribbean; CE-15 in the Pacific Northwest; CD-10, CE-12, and CE-13 in Alaska and the Pribilof Island area; and CH-22 and CH-23 for those flying to and from Mexico. There would be large areas where there would no longer be FAA provided VFR chart coverage should this termination be carried out, possibly resulting in a lack of compliance with ICAO Annex 15. Notably, when Canada discontinued their WACs in 2010, their sectional charts provided overlap and there were no large “gaps.”

Of the respondents who identified they use WACs when flying to the Caribbean, 94% stated they would not have enough information to navigate VFR safely without them. Likewise, 92% of those flying to Mexico using WACs indicated they would not have enough information to navigate VFR safely should they be cancelled. Pilots using WACs in Alaska also show a similar result with 87% responding they thought they would not have enough information to navigate safely VFR in and around Alaska without WACs. Pilots in these three geographic areas clearly rely on WACs for VFR navigation and could be deeply affected by their removal.

Access to Charts and Recommendations

AOPA understands that fiscal limitations prevent the FAA from a complete continuation of the WAC series without an increase of unit cost that could make them unobtainable for many pilots and which may only further decrease their popularity, and thereby ensure their eventual elimination. AOPA supports the FAA’s goal of an economically self-sufficient charting operation, and we would propose the cost of production could be reduced and, although employee costs are exempt, some of the employees who are tasked with WACs now could be redistributed in the future to other charting tasks for greater efficiency within AIS. As the FAA looks at alternatives to avoid WACs discontinuation, we would make the following recommendations:

- Continued publication of select charts
The continuation of a limited number of WACs that would provide the coverage in Alaska, the Caribbean, and the US/Mexico border would eliminate the issue of VFR chart coverage “gaps.” AOPA believes the reduced number of charts and long periods between charting cycles, which could be synched up for greater efficiency, would allow the overall cost to be reduced and manpower to be distributed as needed. Utilizing the data from our survey, more than half the respondents were flying in one of the three areas identified as having “gaps” and where safety would be the most impacted from a discontinuation.

The pilot community's embracement of EFB technology has transformed how many pilots access charts; however, when survey takers were asked how do you obtain your WACs, 77% said through "Sporty's or another chart vendor." Sporty's sells the majority of paper WACs, thus it is important that this media remain available. Far fewer accessed WACs through the FAA's digital chart site, SkyVector or similar websites, or through another method such as ForeFlight. This answer shows many pilots still rely on paper charts. In many cases, these charts are carried in the aircraft as a backup should the onboard moving map or EFB cease functioning. Some Part 135 operators may even be required to have WACs on board. AOPA encourages the FAA to continue to provide paper charts in addition to digital copies.

- Expansion of certain sectional charts
Expanding a limited number of sectionals charts, or the addition of new ones, could fix coverage "gaps" and increase the overall aeronautical information available for that area, creating a new benefit. Allowing there to be one primary VFR chart series could be beneficial if they were expanded to fill in the holes that would exist following the cancellation of WACs. Thanks to the digital seamless stitching of sectional charts, many pilots could integrate the new charts into their Electronic Flight Bag (EFB) and create large presentations similar to those provided by WACs. Those pilots who would want a paper backup would also have a means to purchase a physical copy at a reasonable price. AOPA believes it would be beneficial for the flying public, in any case, to be provided with a table that lists the discontinued WACs and their equivalent sectional chart for easy reference.
- Wall planning charts
We believe the elimination of WACs calls for the creation of new VFR wall planning charts to fill that void created by the elimination of these larger scale flight planning charts. The creation of three new wall planning charts, specific to Alaska, the Caribbean, and the US southern border, could ensure aeronautical information was being made available; however, a wall planning chart is not a suitable replacement for having a chart in the aircraft. Many of the respondents to our survey stated a wall planning chart is not usable in the aircraft, only for planning, and so we would strongly suggest the FAA take this into account and not create a wall planning chart without implementing either new sectional charts or agreeing to continue certain critical WACs.

Regardless of a charts decrease in popularity, and subsequent reduction in sales, the FAA has an obligation to ensure that information necessary to the safe navigation of the national airspace system is available. The FAA must be proactive and seek solutions to cost that do not undermine access to the information for all users, including general aviation, and that do not allow the product to be degraded to where safety of flight information is eliminated.

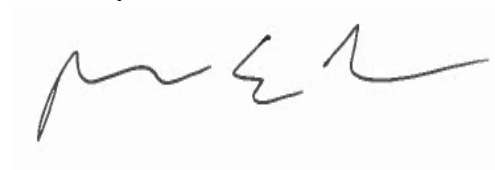
Conclusion and Recommendations

AOPA believes the discontinuation of WACs would negatively impact VFR pilots flying to and from the Caribbean, Alaska, and Mexico. The continuous availability of charts that depict safety of flight information in these three areas is critical. The creation of new wall planning charts, and either increasing the coverage of select sectional charts or the continued publication of specific WACs, would allow pilots to continue to have the necessary information in order to meet the

preflight and inflight requirements required by the regulations. The discontinuation of these important flight charts would result in “gaps” of information and, with no alternative resource, create an adverse impact on safety and even prevent access to certain airports and geographic areas. The significant number of individuals who completed our survey indicates WACs are relied upon by many pilots for flight planning, as a backup to their EFB, and as a primary navigation source in the cockpit.

Thank you for the opportunity to comment on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rune Duke', is centered below the text 'Sincerely,'. The signature is fluid and cursive.

Rune Duke,
Director, Airspace and Air Traffic

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of General Aviation Pilots and Aircraft Owners. AOPA’s mission is to effectively serve the interests of its members 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 the world.