



May 28, 2026

Via Email

Molly Fierro, Compliance Specialist
FAA Phoenix Airport District Office
3800 N Central Ave., Suite 1025
Phoenix, AZ 85012-2136

Dear Ms. Fierro:

For the reasons outlined below, the Aircraft Owners and Pilots Association (AOPA) respectfully requests an immediate and complete stay on the imposition of any fees at Falcon Field in Mesa, Arizona, until the airport sponsor conducts a thorough review and proper economic impact analysis that is shared publicly.

A stay is also warranted here because the City intends to collect these fees using ADS-B data, which could have a negative impact on safety at Falcon Field and surrounding communities. As FAA Administrator Bryan Bedford indicated in his remarks on the recent Congressional hearing held on May 19, 2026, the FAA frowns “on the concept of using ADS-B information for revenue collection at airports” and that, “if [the FAA] need[s] to step up that in terms of how aggressively we dissuade that, we will.”

Moreover, we understand that CAE Phoenix Aviation Academy (CAE) and Thrust Flight Properties, LLC, (Thrust) and perhaps others, have filed complaints with your office regarding the landing fee program adopted by the City of Mesa, Arizona, at Falcon Field Airport. We urge the FAA to carefully review the City’s actions and determine: (1) what data, if any, supports the City’s claim of an economic need for the landing fees and how those fees were established; and (2) whether noise complaints are in fact the reason, in whole or in part, for the imposition of landing fees.

We want to emphasize our concern over how this landing fee program was adopted. From the available information, it appears that the City rushed into a decision in early 2026 without a full and transparent review of the relevant data and failed to engage in the necessary evaluation and analysis that would support imposing landing fees at the airport. As you know, any fees to be imposed must be fair, balanced and satisfy a real economic need at the airport. While the City claims that the fees are required to satisfy the airport’s economic need, we are also concerned by the November 2025 statements by the City council member who sponsored the landing fees:

Thank you for reaching out and for taking the time to share your **concerns** about the **training activity** at Falcon Field. I completely understand how difficult the

Molly Fierro, Compliance Specialist
May 28, 2026
Page 2

ongoing **noise**, frequency of **touch-and-go** operations, and low-altitude flight paths can be for the surrounding neighborhoods.

...

As you may know, [sic] I convened a stakeholder committee earlier this year to **evaluate** the issues surrounding **training flights**, including **noise** impacts ... **and** potential **mitigation** strategies – **landing fees** among them.

See Exhibit C to May 12, 2026, CAE and Thrust Complaint (emphasis added) (copy attached). While an investigation is needed here, these types of statements concern us because it suggests a pattern that we have seen repeated at other airports where the sponsor, facing noise complaints and being unfamiliar with federal grant assurance requirements, decides to impose landing fees to limit aircraft operations and reduce noise complaints. When the sponsor ultimately learns federal grant requirements, they pivot to a different *public* rationale for the fees even though the purpose remains the same – limiting aircraft operations by imposing fees.

As the largest General Aviation membership association, AOPA is a well-established voice in zealously representing and advocating for the aviation industry as a whole and on behalf of General Aviation in particular. Over 380 AOPA members call Falcon Field home, and many others regularly use and fly into Falcon Field. AOPA's mission includes ensuring that aviation remains vibrant, that aviation operations are safe, and that aviation continues to serve the public interest, including providing comment and support on matters that may potentially adversely affect the freedom to fly in the United States—which is the reason for this letter.

AOPA's mission also includes advocating for a robust and accessible aviation infrastructure where our nation's public-use airports are properly maintained, developed, and managed in accordance with the obligations assumed through the investment of public funds. While certain costs may be justified and necessary to protect the future of an airport and our freedom to fly, any fees imposed must be fair, appropriate, and understandable. To ensure that the "public use" of the airport is effectively protected, before any airport sponsor is allowed to impose fees on a public-use airport, the sponsor should be required to disclose the full financial information for the airport and provide a clear projected impact assessment before fees can be imposed. Transparency is essential, and unfortunately transparency is sorely lacking here.

Before the landing fees were imposed, AOPA and other organizations sent two letters to members of the City council (March 4 and March 20, 2026, copies enclosed) and attempted to engage with the City to address any real economic issues at the airport. In the first letter, AOPA, the Arizona Pilots Association, and the Aviation Safety Advisory Group of Arizona, expressed serious concerns with "the **methodology used to develop** the current proposal for Fees and Charges ... including **landing fees.**" See March 4, 2026, letter. Two weeks later, AOPA requested a delay of six months in the Council's vote "to allow for a **transparent**, interactive **reconciliation of the airport's financial needs** in collaboration with the pilot community." See March 20, 2026, AOPA Letter (emphasis added). Unfortunately, our efforts and requests were ignored.

Molly Fierro, Compliance Specialist
May 28, 2026
Page 3

While the City's landing fee program affects all pilots at Falcon Field, the overwhelming allocation of the burden from these fees falls squarely—*perhaps as intended*—on the flight training users at the airport who conduct repeated touch-and-go operations as part of their training. On its face, this disparate impact on one segment of the airport community is unjustly discriminatory, and federal grant obligations forbid it. Flight schools and flight training generally are a necessary segment of our aviation industry, providing the foundation upon which pilots are recruited, trained, and ultimately serve the aviation needs of the public—they also need to be protected.

A landing fee program such as the one adopted by the City at Falcon Field also has the negative effect of deterring all landing practice, something that *every* pilot—not just students—must be proficient in. Proficiency in landings, through practice, should be encouraged, not discouraged. There are no operational reasons to justify hindering touch-and-go operations at Falcon Field and the economic justification for doing so is currently specious, at best.

Ultimately, the City bears the responsibility of objectively and persuasively demonstrating to the FAA and the public—with actual data—that landing fees are necessary and fair, and that they are guided by, and in compliance with, federal grant obligations (Grant Assurances 22, 24, and 25), the FAA's Rates and Charges policy, and the FAA's specifically articulated statutory safety mission.

Now that the FAA has been asked to investigate and decide on the concerns expressed over the City's purported rationale to impose landing fees, the methodology used to set the fees, and the decision to charge a fee for every touch-and-go, we ask the FAA to carefully review and investigate the facts surrounding the landing fee program at Falcon Field and hold the City accountable to its federal grant obligations and other applicable legal guidance.

When conducting its investigation and review, the FAA should examine the City's actions in light of the larger national context of what appears to be a growing and disturbing trend at public-use and federally funded airports across the United States to use landing fees to discourage flight operations and address neighborhood noise complaints. The FAA's decision on this matter will certainly have a national impact and will influence how other airport sponsors proceed in the future and whether and how fees are imposed. Thank you for your time and attention.

Sincerely,

Signed by:



A3D1489F41894DC
FERNANDO CAMPOAMOR

General Counsel, AOPA

o: 301-695-2206

fernando.campoamor@aopa.org

a: 421 Aviation Way, Frederick, MD 21701

www.aopa.org

Enclosures:

*Molly Fierro, Compliance Specialist
May 28, 2026
Page 4*

cc: Faviola Garcia, FAA Director, AWP-600
Gordon Wong, FAA Deputy Director
Birkely Rhodes, FAA Manager, AAS-300
Kyler Erhard, FAA Manager, Phoenix ADO
Chris Nugent, President, Arizona Pilots Association
Cary Grant, President, Aviation Safety Advisory Group of Arizona