



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798
Telephone (301) 695-2000 • Fax (301) 695-2375
www.aopa.org

June 30, 2006

Mr. Steve Kelley, FAA-NAR
c/o Michael Merrill
12005 Sunrise Valley Road
Reston, VA 20191

RE: New York/New Jersey/Philadelphia Metropolitan Area Airspace Redesign Draft
Environmental Impact Statement (EIS)

Dear Mr. Kelley:

The Aircraft Owners and Pilots Association (AOPA), on behalf of its more than 408,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) draft EIS for the New York/New Jersey/Philadelphia metropolitan area airspace redesign. Of the airspace designs being studied, it appears the Integrated Airspace Alternative offers the most substantial operational benefit and provides general aviation the most flexibility. While the study focuses on five major airports and sixteen surrounding satellite airports, the complexity and impacts of the redesign will encompass many smaller airports in the New York/New Jersey/Philadelphia airspace areas that were not included in the modeling data or the EIS. The impacts to all air traffic operations in the metropolitan area and at surrounding airports should be considered during the future aeronautical analysis and implementation of the airspace redesign.

Integrated Airspace Alternative

Based on the comparison of the two alternatives that meet the purpose and need of the airspace redesign, the integrated airspace alternative appears to provide the most significant benefit operationally for airspace users and the FAA. A phased approach concept, in light of the fact that no final decision on the consolidation of the New York Terminal Radar Approach Control (TRACON) and New York Center, offers operational benefits that are not tied to the decision to integrate the facilities but would ultimately provide greater benefit through consolidation. The additional benefit of a turboprop arrival route into Teterboro Airport (TEB), a very prominent general aviation airport in the New York metro area, seems advantageous.

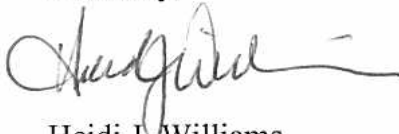
Mr. Steve Kelley
Page 2
June 30, 2006

Need to analyze impacts to all satellite and visual operations

The EIS concludes that airports without considerable instrument operations will see little to no change as a result of the redesign. In fact, satellite airports are almost always affected by an airspace redesign, whether they have considerable instrument operations or are primarily served by visual operations. As the FAA moves forward with the airspace redesign it should continue to coordinate with the aviation community, including outreach to all of the satellite airports in the metropolitan area. In addition, the aeronautical study should include a comprehensive analysis of impacts on transient and visual flight rules operations in the metropolitan area..

AOPA looks forward to the continued development and implementation of this airspace redesign and the benefits and efficiencies to be gained from the integrated airspace alternative. We appreciate the opportunity to provide comments and encourage the FAA to continue the strong collaboration efforts with the user community that have already been established early on during this redesign process.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams", with a long horizontal flourish extending to the right.

Heidi J. Williams
Director
Air Traffic Services