



## AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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

---

April 11, 2007

Ms. Edie Parish  
Docket Management System  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh Street, SW  
Washington, DC 20590-0001

RE: Proposed Modification of the Phoenix Class B Airspace Area, Docket No. FAA-2005-23437; Airspace Docket No. 05-AWA-2

Dear Ms. Parish:

The Aircraft Owners and Pilots Association (AOPA), representing over 410,000 members nationwide, provides the following comments in response to the proposed modifications of the Phoenix (PHX) Class B airspace area in Phoenix, AZ. AOPA is concerned that the proposed airspace design is overly complex and opposes several of the new airspace areas and lowered floors. AOPA and the Phoenix airspace users developed an alternative proposal that reduces the overall complexity and addresses the issues of Class B containment. Further, the proposal mentions changes in the Visual Flight Rules (VFR) flyway east of PHX; however, provides no specifics. The FAA has never discussed changes to the flyway or sought input from the aviation community on potential changes. Finally, AOPA supports lowering the ceiling of the Class B airspace from 10,000 feet mean sea level (msl) to 9,000 feet msl.

### **Complexity Causes Confusion**

The overall complexity of the proposed PHX redesign presents increased potential of safety challenges and operational errors. According to the FAA's Order 7400.2E, Handling Airspace Matters, Section 15-2-3, "simplification of the Class B airspace area configuration is a prime requisite," and "segmentation should be held to an absolute minimum." Based on the proposed modifications, PHX Class B airspace would be the most complex and segmented Class B airspace area in the United States.

While the purpose of Class B airspace is for the containment of instrument operations to the primary airport, the needs of the surrounding general aviation (GA) and user community must also be taken into consideration during the design process. Considering the majority of GA operations are single-pilot operations, workload or cockpit resource management is a constant safety consideration. Complex airspace designs like that proposed for Phoenix, force pilots to constantly change altitudes when circumnavigating the Class B airspace due to multiple sub areas. These sub areas result in the compression of VFR traffic into congested areas or in the case of the proposed changes, into airspace over designated wilderness to the east side of the valley.

### **Proposed Area U Creates Potential “trap” for Unsuspecting Pilots**

The NPRM proposes the creation of a small segment of airspace on the western boundary of Falcon Field (FFZ) between the 10 Distance Measuring Equipment (DME) arc and Gilbert Road. This small parcel of airspace identified as Area U, adds complexity to an already overly complex area. The NPRM indicates Area U would allow a north-south road reference for locally based pilots to avoid the Class B and the FFZ Class D. However, the area would be so small that AOPA is concerned it will potentially become a trap for pilots who inadvertently stray more than a half mile off course. In fact, the loss of lateral airspace to transition on the existing VFR flyway would be a major impact to GA. If FFZ has an operational need to retain control of this airspace as indicated in the NPRM, then a Letter of Agreement (LOA) between the facilities would resolve the control issue and offer a better solution than creating another sub-area of the Class B airspace. We recommend that Area U either be captured in Area C or that Area C be modified to make the eastern boundary align with Gilbert Road.

### **Alternative West Side Sectorization Better Alternative**

As the attached alternative proposal shows, the entire west side of the Phoenix Class B can be divided into three progressively lower floors. This alternative design continues to allow for GA transitions but offers a simpler, less complex configuration and more than makes up for the small amount of airspace pilots may have gained in the FAA’s proposed design. The same is true with the shelves immediately north and south of PHX and the floor north of Scottsdale Airport (SDU).

### **AOPA Opposes to East Valley Plan**

AOPA is opposed to lowering the floor of the entire Area I, specifically the area between the 20 and 25 nautical-mile portion over the East Valley from 8,000 feet msl down to 5,000 feet msl. The proposed floor will severely hamper GA’s ability to transition the Phoenix airspace to the east. Between the Superstition Mountains to the east and the FFZ Class D to the west, there is literally no where for GA pilots to transition on the east side of PHX. The proposed changes to the floor will not permit GA pilots to fly at least 2,000 feet over the Superstition Mountains Wilderness Preserve, which would be against FAA’s very own guidance as spelled out in Advisory Circular, AC 91-36. AOPA recommends raising the floor to 7,000 feet to accommodate the arrivals into PHX and allow for GA transitions underneath the Class B airspace area as well.

### **AOPA and Phoenix Users offer Simpler East Side Alternative**

A simpler, less complex alternative proposal was developed by AOPA and local Phoenix area pilots that offers decreased chance for pilot error and confusion. In order to keep the Class B design simple and maintain the integrity of the necessary VFR flyway on the east side of Sky Harbor, AOPA recommends a number of minor changes to the TRACON’s proposal on the east side. The current proposal has four different floor altitudes in the few miles between Falcon Field and PHX. As shown in the attached graphic, AOPA recommends leaving the Class B surface boundary at Dobson Road and the east side of the sub-area at Gilbert Road, and slightly altering the Falcon Field Class D to conform to Gilbert Road. Since the majority of pilots who use the flyway are local to the Phoenix area, the use of these prominent roads as boundaries is

April 11, 2007

appropriate. The addition of a waypoint could be added over Gilbert road if the use of the road is causing confusion for air carrier pilots on their visual approaches into PHX since it is highly unlikely they are carrying a VFR sectional and the Class B airspace is not depicted on instrument approach charts.

In light of Area Navigation (RNAV) technology and satellite based equipment that many aircraft are already taking advantage of, it would be beneficial for the FAA to develop RNAV procedures in and around PHX that could be utilized to more efficiently allow for arrival and departure flows as well as terminal transition routes that would benefit the GA community.

#### **VFR Flyway Changes Unknown**

The NPRM makes reference under Area C of moving the VFR flyway east of the PXR 10 DME. This is the only reference to VFR flyway changes that exists within the NPRM and is the first time any indication of VFR flyway changes has been put forward by the FAA. While the aviation community may support flyway changes, a clear understanding and depiction of where the flyway would be located and at what altitudes it would exist is necessary before any changes are implemented.

#### **AOPA Supports Proposed Ceiling Changes**

AOPA supports lowering the ceiling from the current 10,000 feet to 9,000 feet msl. This giveback of 1,000 feet will allow the option of transient overflight operations in an airspace area currently not being utilized for PHX arrivals and departures. AOPA applauds the FAA for returning this airspace to the National Airspace System (NAS), which provides a great benefit to the overall user community. At the same time, we appreciate the facilities willingness, at the request of the ad hoc user working group recommendation, to enter into a LOA with the local glider community to enable continued glider operations from 9,000 to 10,000 feet msl. This proposed change allows a win-win situation for all users in the Phoenix airspace area.

#### **In Summary**

While AOPA appreciates the challenges of redesigning the Class B airspace area, the current proposed design is much too complex and does not take the overarching needs of Phoenix airspace users into account. With such an active GA community in the greater Phoenix area, it is imperative that the redesign appropriately addresses the needs of that large user community. AOPA contends that the attached alternative solution better addresses the needs of the GA community and would fully contain existing PHX operations.

Sincerely,



Heidi J. Williams  
Director  
Air Traffic Services

