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March 20, 2008

Mr. Kevin P. Haggerty
Manager, Obstruction Evaluation Service
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

RE: KFI Broadcast Tower Reconstruction

Mr. Haggerty:

The Aircraft Owners and Pilots Association (AOPA), representing more than 415,000 general aviation pilots, again reiterates its opposition to the reconstruction of the 684 foot KFI broadcast tower because it is a hazard to air navigation. On December 19, 2004, the tower was destroyed after a C-182 collided with it while operating under Visual Flight Rules (VFR) into Fullerton Municipal Airport (FUL), Fullerton, California. This was the second time that the KFI broadcast tower was a factor in a fatal aircraft accident. Just this past week, the tower collapsed again due to a construction mishap. AOPA urges the FAA to re-evaluate the safety implications of the tower located in close proximity to FUL in light of this recent tower collapse and resulting injury.

The KFI broadcast tower is a hazard at its current location because of its close proximity to the climb/descent area of the traffic pattern airspace at FUL. The traffic pattern airspace dimensions for an aircraft category "B" airport are defined in FAA Order 7400.2E, Procedure for Handling Airspace Matters, Figures 6-3-11 and 6-3-13. The published instrument approach procedures for FUL establish visibility and ceiling minimums for category B aircraft. Paragraph 6-3-8 d.1.(b)(2) of the FAA Order states:

Beyond the lateral limits of the conical surface and in the climb/descent area - 350 feet above airport elevation or the height of 14 CFR Section 77.23a.(2), whichever is greater not to exceed 500 feet above ground level (AGL). The climb/descent area begins abeam the runway threshold being used and is the area where the pilot is either descending to land on the runway or climbing to pattern altitude after departure.

According to the FAA's published criteria, the immense 684 foot broadcast tower is within 220 feet of the climb/descent area of the traffic pattern airspace (assuming less than four aircraft are in the traffic pattern) for both Runway 24 and 06. It is extremely close to violating the maximum height of 350 feet above ground level within the

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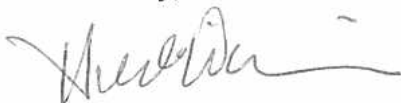
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climb/decent area (The Airport/Facility Directory publishes a right-hand traffic pattern for Runway 24 and a standard left-hand traffic pattern for Runway 06). When four or more aircraft are operating in the airport traffic patterns at the same time, the proposed tower would be in direct violation of the climb/descent area since the airspace criteria increases the length of the traffic pattern by one-half a nautical mile for each additional aircraft over four in the traffic pattern.

The recent accident (NTSB Identification: LAX05FA054) that occurred on December 19, 2004, was the second fatal accident involving an aircraft colliding with the tower. The first fatal accident occurred on January 28, 1970, but did not destroy the tower (NTSB Identification: LAX70AL045). Both accidents occurred during day VFR conditions while the aircraft were operating in the airport traffic pattern at FUL. It is hard to comprehend how the determination of no hazard was arrived at, considering the accidents and resulting fatalities, which are directly related to the location of the tower.

The KFI broadcast tower has adversely affected air navigation by both being a physical obstruction to air navigation and by distracting pilot's attention during critical arrival and departure phases of flight at FUL. Considering at least three fatalities and recent injuries have occurred as a direct result of the site location, height of the tower and possible severe penetration of the FAA's established obstruction criteria for airport traffic pattern climb/decent airspace, AOPA strongly recommends the FAA reconsider this proposal and issue a Determination of Presumed Hazard.

Sincerely,

A handwritten signature in cursive script, appearing to read "Heidi Williams".

Heidi Williams
Senior Director
Airports