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Mr. Robert Beck
DFW ATCT/TRACON
DFW International Airport
2401 International Parkway
DFW Airport, TX 75261

RE: Dallas Class B Modification Proposal

Dear Mr. Beck:

On behalf of more than 415,000 members nationwide, including 30,000 members in the state of Texas, the Aircraft Owners and Pilots Association (AOPA) has reviewed the Federal Aviation Administration (FAA) proposed changes to the Dallas Class B airspace. AOPA is concerned with certain aspects of the proposal due to impacts on flight safety and efficiency.

Often when aircraft are not being contained within the boundaries of a Class B airspace complex, the FAA immediately starts planning the expansion of the Class B airspace in question. The FAA should look at other options that would retain the current airspace, and increase traffic flow and operational efficiencies of all users.

In light of higher fuel costs, environmental and noise sensitivities, and impacts to the general aviation community, the FAA should modify local procedures to allow aircraft on arrival into Dallas/Fort Worth Airport (DFW) to maintain a higher altitude, farther out, and create more of a constant rate descent. This will not only provide for a more efficient system, but will also prevent further extensions of the Class B airspace in the future, as traffic volumes into DFW increase.

Northern Sector Extension to Contain Approaches
AOPA questions the FAA's requirement to create low altitude extensions within the north side of the Class B complex. The extension as proposed will lower the floor of the Class B to 2,500 feet msl, directly over Lakeview Airport, a popular general aviation airport, as well as airspace heavily used by general aviation to transition the area East and West. The modified ceiling will compress transient traffic down into the traffic pattern altitudes of the underlying airport and cause transient traffic to deviate to the north to avoid the area. This creates obvious safety and economic issues that the FAA should address and avoid.

Containment of Approaches into Dallas Love Airport
AOPA questions the need to contain approaches into Dallas Love Airport. The FAA claims two extensions, one over Addison Airport and one to the Southeast, are

required to contain aircraft into Dallas Love Airport (DAL) while on approach. The FAA cites the requirements of FAA Order 7110.65 "*Air Traffic Control*" which refers to 14 CFR Part 91.131(a) (2), which states "*Unless otherwise authorized by ATC, each person operating a large turbine engine-powered airplane to or from a primary airport for which a Class B airspace area is designated must operate at or above the designated floors of the Class B airspace area while within the lateral limits of that area.*"

The point of contention is the term "Primary Airport." On page B-24 of the FAA Order 7400.9S "*Airspace Designations and Reporting Points*", the primary airport for the Dallas/Fort Worth, TX Class B is listed as Dallas/Fort Worth International Airport (DFW). The FAA should reevaluate the need for this extension in accordance with the above references.

If the FAA finds guidance contrary to the above, the boundary of the extension over Addison Airport should be created as far to the Southwest as possible. The Addison Airport is located at an elevation of 644 feet msl, which with a 2,500 foot msl ceiling, leaves less than 1,900 feet to maneuver. If these aircraft are expected to comply with 14 CFR Part 91.119(b) Minimum Safe Altitudes, the vertical area in which they are left to maneuver is reduced to less than 900 feet, for bidirectional flow. The further Southwest the boundary can be established, the safer the operations at the Addison Airport will be.

Need for Dallas Class B 11,000 Foot msl Ceiling

The FAA should take note that other busy terminal airspace areas across the country do not utilize high Class B ceilings. For example, New York City Class B airspace as well as the Boston Class B airspace, both high volume terminal areas, successfully utilizes a 7,000 foot msl Class B ceiling.

Unless the FAA can provide additional data, an 11,000 feet msl ceiling at Dallas is not needed. Using the data provided to the Ad Hoc Committee, AOPA has determined that the Dallas Class B could safely operate with a ceiling of 8,500 feet msl, permitting pilots to transition the Dallas Class B without the need to contact the Dallas Terminal Radar Area Control (TRACON). This would have a positive impact on all users by decongesting frequencies and airspace underlying the Class B shelves.

AOPA appreciates the opportunity to comment of the Dallas Class B Modifications.

Sincerely,

Pete Lehmann
Manager
Air Traffic Services