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April 2, 2010

Mr. Mark Ward  
Manager of Operations Support Group  
Eastern Service Area, Air Traffic Organization  
Federal Aviation Administration  
PO Box 20636  
Atlanta, GA 30320

RE: Proposed Atlanta Class B Airspace Modifications

Dear Mr. Ward,

The Aircraft Owners and Pilots Association (AOPA), representing over 415,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) proposal to modify the Hartsfield-Jackson Atlanta International Airport (ATL) Class B airspace in Atlanta, GA. We appreciate the FAA's effort to follow guidance in FAA order 7400.2G, but in light of initiatives to modernize airspace, it is necessary to take a broad look and ensure that impacts to the entire metroplex area are considered.

AOPA supports the FAA's reduction in the overall circumference of ATL's Class B airspace; however, we are concerned with the impacts on the entire metroplex airspace area associated with lowering the floor in a number of sectors. Specifically, the compression of both instrument flight rules (IFR) and visual flight rules (VFR) traffic and the lack of transition routes (IFR or VFR) through or below Class B airspace needs to be addressed. In the following comments, AOPA is making recommendations that, if adopted, would mitigate these concerns.

#### **Impact to Visual Flight Rules Operators**

Currently, the ATL Class B airspace allows for VFR traffic to safely navigate around the central core of the airspace by remaining below the floor of Class B airspace. Lowering the floor of Class B airspace forces compression of general aviation activity and decreases the separation of aircraft and compromises safety. AOPA is especially concerned with lowered Class B floors in the east-west corridor at 8 to 15 nautical miles north of ATL and requests that the FAA increase the floor in this area to an altitude of at least 6,000 feet.

#### **VFR and IFR Transition Alternatives Needed**

VFR Flyways represent an important tool for both Air Traffic Controllers (ATC) and general aviation because they allow VFR pilots to navigate under or around Class B airspace without requiring a clearance or communication with ATC. The ability to remain clear of the Class B airspace reduces a controller's traffic and communication workload. Based on our review of the committee's proposal, it appears that transition alternatives such as VFR Flyways were not addressed. AOPA supports the ad hoc group's recommendation to incorporate T-routes as an

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IFR transition option and suggests that more work needs to be done to ensure VFR transition alternatives are available.

The FAA's proposed airspace redesign would impact and likely eliminate 9 of 13 available VFR flyways under the ATL Class B airspace. The remaining flyways are all located in the southwest quadrant and leave pilots to the north and east without any charted options to navigate under or around the congested Class B airspace. We recognize that VFR flyways are not part of the Class B rulemaking process, but we urge the FAA to include them in the overall redesign of ATL's Class B airspace. As in other regions, the establishment of a local working group may assist the FAA in exploring these options and AOPA stands ready to assist in this process as needed.

### **Impact to DeKalb-Peachtree Airport**

DeKalb-Peachtree (PDK) airport is the second busiest airport in the state of Georgia and handles more than 228,000 operations each year. The airport would see a 3,000 foot reduction in the floor of the overlying Class B airspace based on the proposed modifications. In addition to the impacts to VFR operations outlined above, IFR operators at PDK would experience increased delays in departures and arrivals due to the overhead flow of commercial traffic into ATL.

Departing aircraft from PDK, particularly westbound departures would be restricted to lower initial altitudes for extended periods of time. Arriving aircraft would be forced to descend to lower altitudes earlier on their arrival. This type of compression of the traffic is inefficient, will burn additional fuel leading to greater carbon emissions, and will lead to an increase in noise complaints from airport neighbors surrounding PDK. Westbound departures from PDK must fly over 30nm before exiting the lateral boundary of Class B airspace. As a result of the VFR compression, impacts to arrivals, departures, and the local community, AOPA requests that the FAA raise the proposed floor of the Class B airspace in the east-west corridor between 8 and 15 nautical miles from ATL to a minimum altitude of 6,000 feet. By raising the floor of the Class B in this corridor, departures from PDK would be able to fly friendly at a more efficient altitude which ultimately reduces noise complaints and carbon emissions. Another alternative to lowering the floor directly over the airport includes a cutout around PDK to reduce the impact of a lower class B shelf surrounding the airport.

### **Visual Identification of Class B Boundaries Important to Reducing Pilot Deviations**

The boundaries of the existing Class B airspace are defined largely by rings or arcs measured from the ATL very high frequency omnidirectional range tactical aircraft control (VORTAC). Under the current and proposed design, large portions of the airspace are and would continue to be defined by straight lines that cannot be easily identified using a very high frequency omnidirectional range (VOR) indicator or distance measuring equipment (DME).

Many general aviation aircraft are not equipped with advanced navigation equipment and rely on visual references to avoid Class B airspace. Because of the non-standard boundaries of the proposed design, there is an increased potential for lateral incursions due to confusion over the

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location of Class B boundaries. AOPA requests that visual references be considered and used to mark the new boundaries of the Class B airspace.

Two areas of the proposed redesign will likely result in inadvertent pilot incursions into the Class B airspace; the north-south boundary to the east side of ATL where the floor drops between the 3,000 foot and 4,000 foot blocks, approximately 21 nm from ATL and the southwest quadrant at 5,000 feet. The boundary lines for these two areas are not straight, do not follow a VOR radial, and have no associated visual landmarks that pilots can easily identify. We request that the FAA straighten the line east of Atlanta separating the 3,000 and 4,000 foot sectors, and use a single VOR radial to delineate the southeast border of the 5,000 foot sector located in the southwest quadrant of the Class B airspace.

### **Summary**

The proposed lowering of the Class B airspace floors will compress VFR and IFR traffic and should be evaluated closely as this compression will cause environmental and noise concerns that the satellite airports will be forced to address with their local communities. In addition, alternative options, such as T-routes and VFR flyways should be included as transition routing options with the proposed changes to mitigate the impact on metroplex operations and transiting traffic. The proposed design negatively impacts PDK airport by compressing VFR traffic, hampering IFR operations and increasing the opportunity for noise complaints. Potential resolutions to the proposed design include increasing the Class B floor by a minimum of 1,000 feet or a cutout around PDK to reduce the impact. Finally, the non-standard layout of the proposal will have the potential for an increase in lateral incursions due to confusion over the boundaries. Such confusion can be alleviated by the use and charting of visual landmarks to identify Class B boundaries.

Thank you for the opportunity to provide comments on the proposed modifications to the ATL Class B airspace and we look forward to the opportunity to provide additional input as requested on the VFR and IFR transition alternatives.

Sincerely,



Tom Kramer  
Manager  
Air Traffic Services