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April 27, 2010

Ms. Edith Parish
U.S. Department of Transportation
Docket Operations, M-30
1200 New Jersey Avenue, SE.,
West Building Ground Floor, Room W12-140,
Washington, DC 20590-0001

RE: Proposed Charlotte Class B Modifications:
FAA Docket No. FAA-2010-0049 and Airspace Docket No. 08-AWA-1

Dear Ms. Parish,

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 Charlotte/Douglas International Airport (CLT) Class B airspace in Charlotte, NC. AOPA is concerned with lowering the floor in Sector J based on the impacts on operators at Chester-Catawba Airport (DCM) and suggests that there may be an opportunity to lower the overall Class B ceiling height from 10,000 feet. In addition, we would ask that the FAA ensure the charted T-routes are effectively being utilized by air traffic control as filed by operators who desire to transition through the Class B airspace. AOPA offers the following alternative options to mitigate the impacts of the proposed redesign.

Impact to general aviation from proposed Sector J

The addition of Sector J would significantly impact general aviation operations at Chester-Catawba Regional Airport (DCM). Skydiving activities account for the majority of operations at DCM and the expansion of Class B airspace over the airport would present a significant, negative economic impact to the skydiving operators, the airport, and the surrounding community.

The FAA cited the UNARM ONE and ADENA TWO Standard Terminal Arrivals (STAR) as the reason behind the need for Class B airspace over DCM. For both of these STAR's, the route never gets closer than 9nm to DCM. On a 3° glideslope, an aircraft complying with the altitude guidance on either of these STARs would be above 6,000 feet upon entering the proposed Class B airspace. A 2 nm radius cutout of the Class B airspace centered on DCM would permit unhampered operations at DCM while containing aircraft inbound to CLT within the Class B airspace.

10,000 foot ceiling

The need for the existing 10,000 foot Class B ceiling should be re-evaluated. Other major Class B complexes around the United States, including New York, NY, Philadelphia, PA, and Boston, MA,

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have a ceiling of only 7,000 feet. There is no requirement for Class B airspace to extend to 10,000 feet. If the airspace above 7,000 feet is not needed for Class B containment, we strongly urge the airspace be returned as Class E airspace. By reducing the ceiling of the CLT Class B airspace to 7,000 feet, non-participating aircraft could transition the area with greater ease, reducing pilot and controller workloads.

Consistent availability of T-route clearance

The Charlotte Class B airspace contains 3 T-routes that enable appropriately equipped pilots to navigate north to south through the CLT airspace. The use of T-routes reduces pilot and controller workload as well as radio congestion, and improves the efficiency of the airspace. Unfortunately, pilots who file for a T-route through CLT airspace are rarely cleared for the route as requested.

Because controllers seldom clear a pilot to use the T-routes at CLT, their utility is dramatically reduced and an important tool in managing airspace is essentially eliminated. AOPA requests that the FAA re-evaluate the T-routes through CLT airspace to ensure those routes are utilized or modified to ensure they are options that pilots can file and fly as expected. Any conflicts with arriving or departing traffic should be mitigated in order to make the T-routes consistently available.

Summary

The addition of Sector J will result in an economic and operational hardship for general aviation operators based at DCM. The addition of a 2 nm cutout around the airport would alleviate much of this burden while still meeting the FAA's goal of containing CLT traffic within the Class B airspace. By re-evaluating and potentially amending the T-routes through CLT, pilots and controllers will benefit from the efficiencies offered by such a route including reduced workload, better flow of traffic, and safer operations. Finally, AOPA urges the FAA to consider a lower ceiling over CLT. As demonstrated at other busy metroplex airports, a lower ceiling provides operational flexibility and permits the use of airspace that would otherwise remain largely vacant.

Thank you for the opportunity to provide comments on the proposed modifications to the CLT Class B airspace.

Sincerely,



Tom Kramer
Manager
Air Traffic Services