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Mr. Anthony D. Roetzel
Manager, Operations Support Group
Central Service Area, Air Traffic Organization
Federal Aviation Administration
2601 Meacham Boulevard
Ft. Worth, TX 76137

RE: Proposed Modification of the Detroit, MI Class B Airspace Area

Mr. Roetzel,

The Aircraft Owners and Pilots Association (AOPA), representing more than 415,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) proposal to modify the Class B airspace over Detroit Metropolitan Wayne County Airport (DTW) in Detroit, MI. Based on input shared during the informal airspace meetings and our analysis, it appears that the outermost airspace ring and increased ceiling height fail to address any safety or containment issue and disregard FAA guidance for the establishment of Class B airspace. In addition, AOPA is concerned that the FAA failed to provide sufficient detail of the proposal as required by FAA Order JO 7400.2G. Based on these concerns, AOPA offers the following recommendations that would meet the goals of separation and containment of instrument flight operations within Class B airspace while simultaneously reducing the impact on general aviation and other operations.

Outermost Airspace Ring Disregards FAA Guidance

The design presented by the FAA at the informal airspace meetings includes the addition of Class B airspace from 25nm to 30nm around a majority of the existing Class B airspace. To date, the FAA has provided no demonstrated safety or containment concerns that would be addressed by the addition of this outermost ring. According to guidance in FAA Order JO 7210.3V, one purpose of Class B airspace is the containment of instrument flight procedures. The proposed outermost ring would not contain any portion of any instrument approach procedure.

Not only is this proposed sector of airspace unjustified, it disregards FAA guidance for the entry to, and exit from, Class B airspace. According to FAA Order JO 7210.3V, "Arriving and departing large turbine-powered aircraft should enter/exit the Class B airspace through the ceiling." The proposed addition of Class B airspace from 25nm to 30nm is 4,000 feet thick. An aircraft entering the Class B airspace from the ceiling in the outermost ring at 10,000 feet would descend less than 2,000 feet while following a 3° glideslope, making a floor lower than 8,000 feet unnecessary and unusable. If it is determined through revised procedures that the 25-30 nm ring is required, AOPA requests that the FAA raise the floor from 6,000 feet to 8,000 feet throughout the outermost ring.

Broader Procedural Review

AOPA is concerned that the FAA is enlarging the Class B airspace to contain aircraft receiving radar vectors from Air Traffic Control, when the charted instrument approach procedure is fully contained within the existing Class B airspace. We understand that controllers need the flexibility to use radar vectors in certain

situations. However, when aircraft receiving radar vectors routinely exit the Class B airspace, it demonstrates a need for a review of procedures rather than simply enlarging the Class B airspace to contain the vectored traffic.

No Justification Provided for 10,000 foot Ceiling

Throughout the ad hoc committee process and informal airspace meetings, the FAA has failed to demonstrate any existing safety or containment issue above 8,000 feet over the Class B airspace that would be solved by raising the ceiling to 10,000 feet. Raising the ceiling of the DTW Class B airspace to 10,000 feet will be more restrictive for aircraft overflying the area. During the informal airspace meetings, it was explained that the increase to 10,000 feet was an attempt to standardize the Class B with others around the country. There is no FAA mandate or policy requiring this standardization and FAA Order JO 7400.2G explicitly states that "each Class B airspace area is individually tailored." Currently, only 56% of Class B airspace areas have ceilings at or above 10,000 feet. Even among the ten busiest Class B metroplexes in the country, 30% have Class B ceilings below 10,000 feet. Lacking a demonstrated safety concern and no FAA mandate requiring standardized lateral or vertical dimensions, there is simply no justification for increasing the ceiling above 8,000 feet.

Concerns with Adherence to the Airspace Redesign Process

Chapter 2, Section 6 of FAA Order JO 7400.2G provides requirements for the Informal Airspace Meetings. Paragraph 2-6-3 contains a requirement to "describe the proposal in sufficient detail, including charts, if necessary, to enable interested persons to prepare comments *prior to the meeting*." No such description was provided in the Federal Register or in local media outlets.

By failing to provide details about the proposal ahead of the informal airspace meetings, the FAA denied the public an opportunity to develop arguments for or against the proposal. AOPA questions the value in soliciting comments just minutes after disclosing the details of the design. We request that in future airspace actions, the FAA adhere to the mandates of FAA Order JO 7400.2G and provide complete details of the proposal well in advance of the informal airspace meeting to allow adequate time for users to review and ask questions during the informal meeting process.

Summary

We appreciate the opportunity to provide input on the proposed design modifications of the DTW Class B shared during the informal airspace meetings. By removing the unnecessary outermost ring from the design and maintaining the existing ceiling height of 8,000 feet, the FAA could reduce the impact to general aviation while meeting the designated purpose of Class B containment and separation. We encourage the FAA to incorporate additional changes to help mitigate the impact on general aviation users prior to proceeding with rulemaking activities to modify the DTW Class B airspace area.

Sincerely,

Tom Kramer
Manager
Air Traffic Services