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March 22, 2012

Mr. Gary A. Norek
Docket Operations, M-30
U.S. Department of Transportation
1200 New Jersey Avenue SE, Rm W12-140
West Building Ground Floor
Washington, D.C. 20590-0001

RE: Notice of Proposed Rulemaking, Proposed Modification of Atlanta Class B Airspace Area; GA:
Docket No. FAA-2011-1237, Airspace Docket No. 08-AWA-1

Mr. Norek,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 general aviation members nationwide, submits the following comments in response to the Notice of Proposed Rulemaking (NPRM) for the Proposed Modification of the Atlanta Hartsfield International Airport (ATL) Class B Airspace Area. AOPA supports the Federal Aviation Administration's (FAA) reduction in the overall circumference of ATL's Class B airspace and the creation of numerous pilot navigation options being proposed. However, we are concerned with the impacts associated with lowering the floor in a number of sectors resulting in the compression of both instrument flight rules (IFR) and visual flight rules (VFR) traffic. In addition, AOPA remains concerned with the impacts on Dekalb-Peachtree Airport (PDK) airport.

VFR Pilot Navigation Options Beneficial

Currently, the ATL Class B airspace allows VFR traffic to safely navigate under the airspace via 13 existing VFR flyways. We appreciate the FAA's willingness to ensure these VFR pilot navigation options remain and are amended as needed based on the proposed airspace changes. It also appears the agency is providing enhanced VFR situational awareness options through VFR waypoints and reporting points. AOPA stands willing to assist the FAA in placement of those needed VFR navigation references to maximize their usefulness. The addition of T-routes through ATL is also a welcome option and we look forward to future opportunity to comment on those proposed routes.

Cut-Out for Covington Municipal Airport Beneficial

We appreciate the responsiveness of the FAA to address the concerns raised and recommendation to provide a cut out for Covington Municipal Airport (9A1). The return of airspace not needed for Class B containment is a key consideration for the general aviation community and we commend the agency and support the return of the airspace surrounding 9A1.

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Compression of Traffic Remains a Concern

Lowering the floor of Class B airspace forces compression of general aviation operations while raising additional concerns of decreased separation and safety. AOPA is especially concerned with lowered Class B floors in the east-west corridors from 8 to 15 nautical miles (nm) north of ATL and requests the FAA increase the floor in this area to an altitude of at least 6,000 feet. DeKalb-Peachtree (PDK) airport is the second busiest airport in the state of Georgia and handles more than 228,000 operations annually. 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, IFR operators at PDK would likely 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 and arriving aircraft would be forced to descend to lower altitudes earlier on their arrival. This type of traffic compression 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 since aircraft currently operating below the Class B floor will likely remain below 5,000 feet instead of the current floor of 8,000 feet. The argument that noise will not be increased due to the fact that aircraft within the Class B will remain at current altitudes is not a valid argument. The noise generated by aircraft flying at lower altitudes due to compression from being held below the Class B floor is more than likely going to generate new noise concerns and has not been addressed by the FAA in their study. As a result of the VFR compression, impacts to arrivals, departures, and the noise concerns of the local community, AOPA requests the FAA raise the proposed floor of the Class B airspace in the east-west corridor between 8 and 15 nm 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 resulting in reduced noise complaints and carbon emissions.

Summary

AOPA appreciates the efforts of the FAA to provide VFR pilot navigation options and enhanced situational awareness resources for the general aviation community. AOPA stands ready to provide input and collaborate with the agency on where those VFR flyways, waypoints and reference points should be located for maximum benefit. We would encourage the FAA to reevaluate the proposed lowering of the Class B airspace floors – especially over PDK, as a result of the compression and the environmental and noise concerns the satellite airports will be forced to address with their local communities.

We appreciate the opportunity to comment on the NPRM for the Atlanta Class B airspace, and look forward to future opportunity to provide input on T-routes being established.

Sincerely,



Sr. Government Analyst
Air Traffic