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September 27, 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 Philadelphia Class B Airspace Area; PA: Docket No. FAA-2012-0662, Airspace Docket No. 08-AWA-2

Mr. Norek,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Notice of Proposed Rulemaking (NPRM) for the Modification of the Philadelphia International Airport's (PHL) Class B airspace. AOPA is encouraged by the Federal Aviation Administration's (FAA) decision to reduce the lateral distance of the outer boundary in certain areas from 24 to 20 nautical miles (NM), and maintaining a ceiling of 7,000 feet MSL. While recognizing that the FAA was responsive to AOPA's recommendation of the establishment of Class B extensions to the northeast and southwest, there is still an opportunity for refinement. A safety hazard that is created as a result of the establishment of the Class B extensions needs to be mitigated along with a simplified lateral design and the modification of varying floor heights.

### **Class B Shelves Create Safety Hazard**

The two proposed Class B shelves would be located on the Northeast and Southwest corners of the current airspace and would extend from 4,000 feet Mean Sea Level (MSL) to 7,000 feet MSL. Of particular concern for AOPA is the Northeast shelf, as this airspace currently serves as an unofficial Visual Flight Rules (VFR) "flyway". Currently, aircraft transiting from the north and south are able to avoid both Class B airspace and McGuire Alert Area (A-220) by utilizing this airspace. As such, this area is already heavily congested with bi-directional VFR traffic. By implementing a shelf, the FAA would take already congested airspace and compact it even further requiring pilots to fly below 4,000 feet MSL while avoiding Class B airspace, A-220 and other aircraft. Despite the FAA's offer to provide flight following, traffic advisories, or Class B

separation services for pilots wishing to transition through or around the shelf, pilots are more likely to fly under the shelf in an attempt to avoid the Class B airspace altogether. This creates a safety of flight issue with a large amount of traffic within a confined area.

The United States Air Force's (USAF) 305th Air Mobility Wing has expressed concerns with this very issue. They agree that this expansion will potentially force a significant amount of VFR traffic, attempting to circumnavigate the PHL Class B airspace, through A-220. AOPA shares the USAF's concern regarding the impact on midair collision avoidance in this area due to airspace compression. With the Base Realignment and Closure process, McGuire Air Force Base is expected to see a significant increase to flight operations from their current level further compounding the issue.

Modifying the proposed design to allow for a VFR flyway between the outermost Philadelphia Class B boundary and A-220 would help alleviate the congested airspace. This flyway would need to remain large enough to allow for bi-directional traffic to safely transit.

#### **Complexity of Lateral Design Needs to be Simplified**

AOPA members have expressed concern with the complexity of the design of the proposed PHL Class B airspace. A successful Class B design balances the need for simplicity with the need for access in the vicinity of Class B airspace while protecting arrivals and departures from PHL. While we appreciate the FAA's efforts to minimize the impact on general aviation through cutouts and division of sectors, it has resulted in a design with multiple problem areas that are likely to result in pilot confusion, frustration, and inadvertent airspace incursions. A more simplistic design would eliminate these problem areas while still meeting containment goals.

#### **Varying Floor Heights and Lack of VFR Landmarks Concern Underlying Airports**

The various proposed Class B floor heights pose a concern particularly around the New Castle Airport (ILG) and Northeast Philadelphia Airport (PNE) Class D areas. Aircraft departing the Class D airspace have the potential to find themselves at the boundary of Class B airspace upon departure with no clear landmarks indicating where it begins. With floor heights of all different altitudes over very small geographic areas, the potential for airspace violations becomes extremely high. Limiting the amount of varying floor altitudes over a small geographic area would mitigate pilot confusion and potential incursions.

#### **Summary**

The complexity and lack of VFR landmarks, along with various floor heights create an overly complex Class B airspace area that pilots will find difficult to transit and may lead to inadvertent airspace incursions. Furthermore, portions of the proposed Class B modifications present barriers to current VFR flyways used today and reduce the airspace area that is currently used to circumnavigate Class B and A-220. AOPA encourages the FAA to mitigate these areas of concern to ensure the most effective, efficient and safe modification to the Philadelphia Class B airspace area.

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Thank you for the opportunity to submit comments on the NPRM for the Philadelphia Class B airspace area.

Sincerely,

A handwritten signature in black ink that reads "Melissa McCaffrey". The signature is written in a cursive, flowing style.

Melissa McCaffrey  
Senior Government Analyst  
Air Traffic Services