



421 Aviation Way
Frederick, Maryland 21701

T. 301-695-2000
F. 301-695-2375

www.aopa.org

October 10, 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 Detroit Class B Airspace Area;
MI: Docket No. FAA-2012-0661; Airspace Docket No. 09-AWA-4

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 Detroit Metropolitan Wayne County Airport's (DTW) Class B airspace. AOPA is encouraged by the Federal Aviation Administration's (FAA) decision to reduce the size of the proposed class B on the west side to a configuration that is similar to what was suggested following user feedback. While this is an important step in ensuring the safety and effectiveness of the redesign, there is still an opportunity for refinement including a reformed ceiling and outer boundary, as well as limiting the amount of varying floor altitudes.

Raised Ceiling Unjustified

The NPRM proposes raising the upper limit of the Class B airspace to 10,000 feet Mean Sea Level (MSL). This increased ceiling will greatly decrease Visual Flight Rule (VFR) pilot's ability to overfly the Class B airspace. While the NPRM states traffic will still be able to fly over or under the airspace, the reality is most VFR pilots would be forced to circumnavigate a Class B airspace potentially 60 Nautical Miles (NM) in diameter. Furthermore, this increase in ceiling comes with no clear justification. The NPRM claims the intent of the increased ceiling is to maintain segregation of large turbine aircraft from their VFR counterparts primarily during potential future triple Precision Runway Monitoring (PRM) Simultaneous Instrument Landing System (SILS) approaches. However it does not appear the FAA has exhausted their evaluation of techniques to contain these triple PRM SILS approaches at ranges beyond 25 NM prior to requesting additional airspace for them.

Extended Boundary

The FAA is proposing to extend the outer ring of the Class B airspace to 30 NM at a height of 6,000 to 10,000 feet MSL. User feedback brought forth that limiting this outer boundary to 25 NM citing no clear need except, possibly in the north-northeast (NNE) and south-southwest (SSW) to allow for vectoring. The FAA declined to heed the Committees recommendations in the NPRM again citing the potential future need to conduct triple PRM SILS approaches. This is also alluded to as the reason the floor of the outer ring cannot be raised to 8,000 feet MSL. Again, it seems unreasonable the FAA would cite this approach procedure that has yet to be used at DTW as the primary reason necessary to extend the Class B boundary and ceiling. AOPA recommends that the FAA conduct due diligence and evaluate the potential need if and when the time arrives, for containing traffic using this procedure prior to requesting large amounts of additional airspace to facilitate it.

Varying Floor Heights

The various Class B floor heights being proposed pose a concern particularly around the Young Municipal Airport (DET) and its associated Class D airspace which extends to 3,100 feet MSL. The proposed Class B would overlay this Class D airspace with a 3,500-foot MSL floor over the southwest half and a 4,000-foot MSL floor over the northeast half. With floor heights of different altitudes over one airport the potential for airspace violations becomes extremely high. Limiting the amount of varying floor altitudes over this area would mitigate pilot confusion and potential incursions.

Negative Impact on Training Operations

The design put forth in the NPRM will have a negative impact on training operations in particular the frequented practice areas near the Eastern Michigan Aviation South Practice Area and the General Motors Proving Grounds. Under the proposal the South Practice Area would fall at a point where the Class B floor would extend to 4,000 feet MSL. This low floor would result in a lack of maneuver area to safely operate, particularly during stall practice. The FAA's Private Pilot Practical Test Standards require these operations to be completed above 3,000 feet above ground level (AGL). The 4,000 foot MSL shelf will effectively force most Private Pilot training activities to the North Practice area causing further congestion of VFR operations.

Summary

While AOPA appreciates efforts to modify parts of the proposed redesign more changes need to occur. There appears to be no justification to raise the ceiling of the Class B airspace to 10,000 feet while extending the boundary to 30NM. AOPA believes that an upper limit of 8,000 feet MSL and an outer boundary of 25 NM would adequately contain traffic. There is no clear reason why containment and safety mandates could not be obtained given these dimensions and doing so will go far in maintaining the general aviation public's ability to conduct operations in and around the Detroit Metropolitan Area. AOPA encourages the FAA to mitigate these areas of concern to ensure the most effective, efficient and safe modification to the Detroit Class B airspace area.

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

Sincerely,

A handwritten signature in black ink that reads "Melissa McCaffrey". The signature is written in a cursive style with a large, stylized initial 'M'.

Melissa McCaffrey
Senior Government Analyst
Air Traffic Services