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October 1, 2008

Ms. Anne Hulseley
Support Manager, Plans and Programs
Federal Aviation Administration
Chicago TRACON
1100 Bowes Road
Elgin, IL 60123

Dear Ms Hulseley:

RE: Chicago Class B Modification Proposal

On behalf of more than 415,000 members nationwide, including 30,000 members in Illinois, Indiana, and Wisconsin the Aircraft Owners and Pilots Association (AOPA) has reviewed the Federal Aviation Administration (FAA) proposed changes to the Chicago Class B airspace. AOPA opposes the changes and urges the FAA to consider implementing the Ad Hoc Committee proposal.

Eastern Side Extension Unnecessary

AOPA questions the FAA's need to extend the entire Eastern half of the Chicago Class B airspace. The FAA should use data to determine whether the airspace is warranted. The data the FAA presented to the Ad Hoc Committee only supported the need for a small 7 nm to 10 nm section of airspace. To date, the FAA has not provided data that would indicate a need for such a large reclassification of airspace. If additional information becomes available, the FAA should re-convene the user group for additional discussion.

Western Extension Creates Safety Concerns for VFR Traffic

During the Ad Hoc Committee meetings, the FAA provided data showing there is a consistent failure to contain aircraft on approach to Chicago O'Hare Airport (KORD), when landing to the East. The committee took into consideration all air traffic factors, including the need for non-participating Visual Flight Rules (VFR) to be able to transition below the Class B, and recommended the FAA assign an altitude of 5,000 feet msl for a floor of this extension.

Despite the committee recommendation to establish the floor altitude of 5,000 feet, the FAA proposes to lower the floor to 4,000 feet msl. However, due to adjacent Class D airspace, and the proximity of multiple airports and air traffic patterns, assigning a floor at 4,000 feet msl compromises safety due to compression of air traffic.

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Requiring large aircraft to descent to altitudes as low as 4,000 feet msl, 30 nm away from ORD appears to be an inefficient use of airspace, and is inconsistent with recent FAA efforts to promote and implement constant descent arrival procedures. If the FAA designs and utilizes routes and flow patterns that maximize efficiency, general aviation safety concerns would be reduced as well.

Potential Strategy to Raise Western Side Floor

AOPA research indicates that the FAA should consider a series of changes that may alleviate the need for large aircraft to descend so low, so far from the destination airport. The FAA should research various possibilities and convene the ad hoc user group to review options to alleviate the issue.

One such solution identified by AOPA for consideration by the group is to alter the Chicago Air Route Traffic Control Center (ARTCC) boundary between MALTA and FARMM sectors 3-4 miles north, and straighten this boundary. Then the Chicago Terminal Radar Approach Control (TRACON) could possibly raise the floor of the Western side extension safely to 5,000 feet msl. The trade-off will be that the Chicago ARTCC assigned preferential route (PAR) of *'Dubuque (DBQ) Rockford (RFD) Victor Route 100 (V100) KRENA intersection,'* for satellite arrivals will no longer be practical. This is easily solved by changing that route to *DBQ KRENA intersection, or DBQ J100 (radial) V100 (radial) KRENA intersection* for the few remaining aircraft that are not RNAV equipped. There currently are numerous precedents for utilizing RNAV only PAR's (TWINZ arrival to Minneapolis area, several Standard Terminal Arrival Routes (STARs) to Chicago area airports).

The other issue that potentially prevents raising the Western Extension to 5000 feet msl is topping PLANO arrivals with Midway Airport (MDW) departures through Chicago TRACON Sector 3. Currently, PLANO arrivals come in at 11,000 feet; according to FAA controllers that have worked these sectors in past years, PLANO arrivals crossed at 10,000 feet msl as a Standard Operating Procedure (SOP) in the past. This apparently was changed due to a vertical boundary change between PLANO/STQ sectors at Chicago ARTCC.

Chicago O'Hare Air Traffic personnel confirm that reverting to PLANO arrivals at 10,000 feet, or even 9000 feet or lower when landing straight in to Runway 4, would alleviate their concerns about topping the arrivals with departures, and assist greatly with their overall operation.

Chicago May Not Need a 10,000 Foot msl Ceiling

The FAA should take note that other busy terminal airspace areas across the country do not utilize high Class B ceilings. For example, New York City Class B airspace, as well as the Boston Class B airspace, both high volume terminal areas, successfully utilizes a 7,000 foot msl Class B ceiling.

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Unless the FAA can provide additional data, a 10,000 feet msl ceiling at Chicago is probably not required. Using the data provided to the Ad Hoc Committee, AOPA has determined that the Chicago Class B could safely operate with a ceiling of 7,500 feet msl, permitting pilots to transition the Chicago Class B without the need to contact the Chicago Terminal Radar Area Control (TRACON). This would have a positive impact on all users by decongesting frequencies and airspace underlying the Class B shelves.

AOPA appreciates the opportunity to comment on the Chicago Class B modifications. If there are any questions, do not hesitate to contact me at 301-695-2207.

Sincerely,

A handwritten signature in black ink, appearing to read "Pete Lehmann". The signature is stylized with a large initial "P" and a long horizontal stroke at the end.

Pete Lehmann
Manager
Air Traffic Services