February 12, 2001

Manager, Air Traffic Division, AGL-500
Federal Aviation Administration, Great Lakes Region Headquarters
O'Hare Lake Office Center
2300 East Devon Avenue
Des Plaines, IL 60018

Dear Mr. Blum:

The Aircraft Owners and Pilots Association (AOPA), representing the interests of over 365,000 aviation enthusiasts and professionals nationwide, respectfully submits its objection to the proposed expansion of the Minneapolis-St. Paul (MSP) Class B airspace. This initial draft, recently presented by the Federal Aviation Administration (FAA) to local users, places an undue operational and economic burden on the general aviation community.

The following provides an overview of AOPA's concerns as they relate to this airspace proposal:

Operational and Economic Issues

1. Raising the ceiling of MSP's Class B from 8,000 feet to 10,000 feet would pose a serious operational limitation to those pilots wishing to over fly this airspace. In the absence of any mitigating action, such as charted VFR flyways, non-participating traffic would be forced to circumnavigate the MSP Class B. Such action is further complicated by the proposed expansion of the Class B's lateral boundaries.
2. Extending the 4000-foot shelf forces non-participating aircraft to fly at lower altitudes further from the Minneapolis Airport and population center. This will increase noise-related concerns for the surrounding communities. This would undermine the efforts of GA pilots to fly friendly and maintain a positive relationship with the non-flying public
3. Flight instructors conducting air work requiring greater altitudes, such as spin training, stalls, etc. would be required to fly greater distances to remain clear of the new Class B boundaries.

4. The proposed changes would make cross-country soaring nearly impossible for pilots at the Benson Airport. The 4,000-foot MSL shelf (3,000' AGL) would extend from its current position 3 miles to the north-northeast, to 13 miles. Entry to Benson from outside of the proposed airspace would require a glide ratio of 40:1. The two-seat gliders owned by the Red Wing Soaring Association only have a glide ratio of 28:1.
5. The proposed airspace action would also have a decidedly negative impact on general and cross-country soaring activities at Stanton Airport. Stanton is located beyond the existing 20-mile ring, but within the proposed 30-mile ring. This change would move the operational ceiling for glider activities down from 8,000 feet MSL (7,000 AGL) to 4,000 MSL (3,000 AGL). Pilots would be forced to fly approximately 5 miles to the south/southeast to clear the 30-mile ring. This would make cross-country soaring much more difficult, considering that most good soaring days occur with winds from the northwest. Returning to Stanton would require pilots to fly upwind under the ceiling. Given the performance limitation of the gliders based at Stanton, such an operational change would be both difficult and dangerous. These changes would also impact soaring record and badge attempts, which usually start at an altitude of just below 3,281 feet AGL. The new ceiling would limit the ability of pilots to begin at the maximum altitude, impacting flight speeds and times.

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Responses to FAA Comments

In addition to the issues cited above, AOPA is also concerned with some of the comments brought forth by the FAA in its staff summary and meeting presentation.

1. During the meeting held January 13, 2001, the public was told that the study upon which this proposal was based has been under development since 1996. Although the FAA representative stated that both the Airline Pilots Association (ALPA) and the National Business Aviation Association (NBAA) were briefed on this issue, AOPA was apparently excluded, depriving the general aviation community of any opportunity to participate. AOPA had no knowledge of the aforementioned proposal prior to the meeting announcement posted in the Federal Register October 30, 2000. According to FAA order 7400.2E, paragraph 15-3-3 the regional ATD shall ensure that user input is sought and considered prior to formulating any planned Class B airspace area design. It is our desire that general aviation input be included in this coordination process in any future airspace proposals.

2. In the executive summary provided to meeting participants, it is stated, "No additional staffing or equipment is required to accommodate the Class B airspace expansion." However, given the volumetric increase in Class B airspace, coupled with the anticipated traffic increase that is its catalyst, the prospect of no additional staffing as part of this initiative appears to be short sighted.
3. According to FAA order 7400.2E, Procedures for Handling Airspace Matters, there is no recommended national standard for Class B airspace limitations. The order stipulates that the vertical or upper limit of the airspace normally should not exceed 10,000 MSL and the lateral or outer limit shall not exceed 30 NM radius from the primary airport. As part of the reasoning behind the proposed airspace changes, the executive summary states that it is imperative that the Minneapolis Class B airspace be expanded to conform to a national recommended standard that in fact does not exist.
4. Incorporated into the background portion of the executive summary is the observation of controllers from the Minneapolis TRACON stating their concern over the presence of uncontrolled, unidentified VFR aircraft transiting the Minneapolis Airspace at 8,500 feet thus creating a need for an increase in the lateral limits of the Class B to 10,000 feet MSL. Based on case history, there are several alternatives that could be explored to ensure the safest possible environment for all traffic in and transiting through MSP Class B airspace as it currently exists. One such option might be the establishment and charting of VFR flyways. As the study indicates, there currently are no charted VFR flyways or corridors depicted for the MSP terminal area. At the very least it is necessary to explore the options and alternatives available in order to avoid an unnecessary airspace "grab" that effectively restricts, limits, and hampers transient general aviation traffic into MSP and surrounding satellite airports.
5. According to the FAA in the latest scooping meeting, there have been 37 TCAS events within the past 12 months outside of the current Class B airspace. However, when AOPA queried the FAA on the type of aircraft involved in these TCAS events no specifics were available. Should the FAA continue to use these events as a basis for the proposed expansion, specific information on each event would need to be reviewed in order to provide firm justification that these events could have been avoided with an expansion of the current Class B system.

We appreciate the opportunity to provide comments on the MSP proposed Class B airspace expansion. We ask that the FAA take immediate steps to terminate this proposed airspace action and continue to work with local users to address their concerns, without regulatory action.

Sincerely,

Heidi J. Williams
Associate Director
Air Traffic Services

Cc: Reginald Matthews, Manager, ATA-400
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