

Memo

Date: 2/12/01

To: Air Traffic Manager, Nashville Air Traffic Control Tower, Federal Aviation Administration, 515 Olen Taylor Drive, Nashville, TN 37217

From: Aircraft Owners and Pilots Association

RE: Nashville Class B Airspace Proposal

The Aircraft Owners and Pilots Association (AOPA) appreciates this opportunity to provide comments on the Federal Aviation Administration's (FAA) proposed establishment of Class B airspace at Nashville International Airport (BNA).

AOPA is opposed to the establishment of Class B airspace at BNA. The Nashville Air Traffic Control (ATC) Tower Staff Study does not demonstrate adequate need and FAA technical information suggests that the current Class C airspace appropriately protects existing BNA traffic patterns and traffic counts. This proposed airspace is an unnecessary airspace "grab" that effectively restricts, limits, and hampers transient general aviation traffic into BNA and satellite airports in the surrounding area. While BNA apparently meets the minimal establishment criteria for Class B airspace, based on the number of enplanements, the staff study does not provide any background or factual data to justify the NEED for Class B Airspace at BNA.

There does not appear to be strong user support or consensus concerning this proposed airspace and although the design and development process was originally initiated in 1992, several factors used as a basis for justification at that time are now obsolete. As a result, the original effort for establishing Class B airspace was terminated in 1996. To our knowledge, the only significant change since 1996 has been the number of enplanements. The enplaned passenger count is not a reliable indicator of total traffic counts and is not a valid measure of the number of aircraft operations in a terminal area. With increased load factors and the evolution of larger passenger jets the enplaned passenger count will continue to increase at a rate greater than the increase in the number of actual aircraft operations. Because the establishment of Class B airspace should be predicated on other factors, AOPA

believes that the proposed Nashville Class B airspace action is premature and unnecessary.

The staff study does not adequately address the operational considerations and impact on VFR traffic in and around BNA. It is critical that the FAA address this oversight by conducting a comprehensive review of VFR traffic and seeking input from local general aviation pilots.

Air Traffic at BNA has not changed significantly since 1996 and AOPA would like the FAA to outline the complexity and airspace saturation differences between 1996 and the present. Our review has not uncovered any significant changes. Our review shows that American and American Eagle used to operate a "hub" concept with their flights arriving and departing in a very short time span, briefly "saturating" the airspace to level 5 complexity. It appears that the situation has now changed and these operators no longer create this kind of short-lived demand. Instead, the activity is a fairly light but steady stream of traffic, seldom creating airspace congestion. Air traffic numbers alone do not tell the entire story, nor should they be used as empirical evidence of the need for more restrictive airspace.

Based on the staff study, it appears that only two options have been considered in addressing the concerns of increased demand on the current system. However, there are several regulatory alternatives, which could provide increased capacity in addition to providing a safe, orderly, and expeditious flow of traffic in the existing Class C airspace at BNA. AOPA would be happy to get together with the appropriate FAA personnel to review these alternatives.

AOPA is committed to working with FAA to ensure that the airspace around BNA continues to provide adequate protection for all aircraft without unnecessarily impacting general aviation. 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. All other options for maximizing safety and efficiency must be explored to ensure the needs of all airspace users are adequately addressed.

Sincerely,



Heidi J. Williams
Associate Director
Air Traffic Services