



Aviation Safety Advisory Group of Arizona
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DEPT. OF TRANSPORTATION
DOCKETS

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December 15, 2008

Mr. Hank Krakowski
Docket Operations, M-30
U.S. Department of Transportation
1200 New Jersey Ave SE
Washington DC 20590-0001

RE: Docket number FAA-2008-1087-0006

Dear Mr. Krakowski:

The Aviation Safety Advisory Group of Arizona (ASAG) is a non-profit membership organization serving the greater aviation community in Arizona. Our members include representatives from the pilot community, flight schools and universities, state government, air traffic control, aircraft manufacturers, airport operators, airlines, and military facilities.

Concerning the above cited Notice of Proposed Rule Making to create Special Air Traffic Rules for the airspace surrounding Luke Air Force Base, we have the following safety concerns:

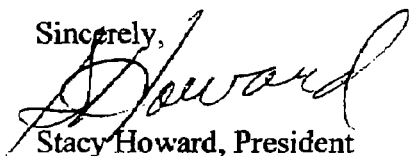
The proposed SATR creates conditions identical to that of Class C airspace in that two-way communications are required for entering and operating throughout the area. However, unlike FAA facilities, availability of Luke RAPCON is highly dependent on base activities, and there are numerous times, i.e. most weekends, most nights, during safety stand-downs, and over holidays, when RAPCON is not in service. The proposed rule makes no provision for how pilots will be notified of the unavailability of Luke Air Traffic Services. This issue of when services are and are not available and what the expectations are for pilots who wish to operate in the SATR during times when RAPCON is unavailable must be addressed.

When RAPCON is not available, or when the limited staffing at Luke RAPCON is unable to provide services, traffic departing or arriving at local airports is forced into a narrow, low altitude corridor between the proposed SATR and Phoenix Class B airspace. Compressing two way visual traffic into such a confined area leads to unsafe "no way out" conditions for pilots.

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ASAG works closely with the Safety Team at Luke Air Force Base to provide opportunities for pilot education. When Luke brought this issue to our attention, ASAG engaged in a coordinated effort with Luke, the Phoenix Airspace Users Work Group and local pilot organizations. We were able to get signs with Luke ATC frequencies posted near the runways at general aviation airports near Luke AFB, updated graphics depicting the locations of Luke's high density operations in and around Alert Area 231 into the hands of flight schools and airport users, and the Luke RAPCON frequency published on aeronautical charts. These efforts paid off in reduced conflicts between GA and Luke traffic. We believe these and continued communication efforts are the preferred alternative to adding more complex, restrictive regulatory airspace in the Phoenix area.

Sincerely,



Stacy Howard, President

Aviation Safety Advisory Group of Arizona