

Deer Valley Pilots Association
P.O. Box 43285, Phoenix, Arizona 85080-3285
Email: dvtpilot@dvtpilot.com

December 7, 2008

Honorable Robert A. Sturgell
Acting Administrator
800 Independence Avenue, SW
Washington, DC 20591

Dear Administrator Sturgell,

Deer Valley Pilots Association (DVPA) represents over 1,000 pilots at the #2 busiest General Aviation airport in the nation. We oppose implementation of the proposed Special Air Traffic Rule (SATR) published in the Federal Register on September 26, 2008 (Docket No. FAA–2008–1087).

The Luke SATR proposal planning and development has been very one sided with only minimal General Aviation community involvement and dialog. Phoenix Airspace Users Work Group (PAUWG) is a forum that addresses local airspace concerns. Luke AFB is represented in the group but is insensitive to SATR related discussion and requests. The comment jokingly made is “If we share or tell you information then we will have to kill you.” With that being the prevailing attitude, a collaborative problem resolution spirit is suppressed.

General Aviation (GA) is being denied the opportunity to share and collaborate on ideas, suggestions and information in developing a common airspace resolution benefiting both military and civilian users. General aviation pilots prefer communicating with Luke RAPCON because it creates a safer airspace. What GA pilots oppose is additional restrictions, loss of airspace and little to no regard for GA problems, i.e. finding new training airspace and bearing the additional flight time and expense required in order to circumnavigate the SATR.

Deer Valley airport took an active role to select and mitigate the airspace safety concerns with implementation of two major programs.

1. Installing new airport signage alerting pilots departing westbound to contact Luke Approach (RAPCON).
2. Creating and implementing an awareness program to educate DVT pilots of the high conflict airspace. It uses websites, bulletin boards, emails, meetings and Newsletters to convey safety concerns.

Luke AFB was asked in a January 16, 2006 DVPA letter to consider alternatives to reduce congestion and enhance safety. To date, there has been no consideration, discussion or response. A summary of the stated alternatives are:

1. Publish Luke peak periods so GA pilots can schedule flights around them.
2. Update “near pass” statistics so airports can measure success of their safety programs.
3. Educate GA on safety concern with a “Luke Day”.
4. Report Luke activity status on adjacent airport ATIS for GA pilots.
5. Provide squawk codes to adjacent airport aircraft before takeoff.
6. Reduce “standby” RAPCON responses resulting from workload and under staffing.

Deer Valley airport is a training airport much like Luke AFB. In 2007, it had almost twice the aircraft operations as Luke AFB. Additionally, the adjacent airports of Goodyear (GYR), Glendale (GEU) and Deer Valley (DVT) together had four times the 2007 Luke AFB traffic. With current economic conditions, these training airports are critical to local community economics. The high concentration of training traffic around Luke presents congestion problems. However, dividing up existing shared Class E airspace, adding complex airspace boundaries and assigning it to Luke for exclusive limited training is not the answer. This is an airspace “grab” that gives no consideration to GA training needs and community economics.

Phoenix Northwest area training airspace is at a premium. Reducing Class “E” airspace for SATR will make the training airspace smaller and more concentrated. Costs for mandatory proficiency training, primary training and pilot license additions will increase as pilots are forced into more remote and mountainous areas of Arizona. Local daytime airspace is so concentrated that DVT flight schools are now increasing night flights to avoid the congestion.

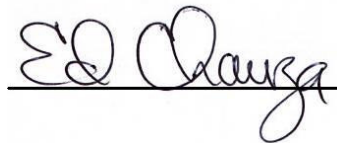
The SATR proposal does not address night flight traffic conflicts between military and civilian flights. Luke conducts extensive Night Vision Goggle training with flights returning late night and mixing with GA night flights. The SATR is active only during daylight hours and offers no benefit to night operations. Will the next step be to extend SATR hours for night operations and totally exclude GA flights?

General Aviation isn’t well organized or influential like the United States Air Force. However, the Federal Aviation Administration is required to consider ALL aviation concerns, including GA interests, when making a decision. The proposal process is, no doubt, following the legal formal procedure but falls short when it does not involve the GA community. As for a workable airspace solution, “the devil is in the details” and until those details are publicly addressed it will be like mixing oil and water between military and civilian authorities.

The GA community is always interested in solving airspace problems. However, it must be a solution that is sensitive to BOTH military and civilian users needs.

All pilots want a safe airspace. Please consider the concerns and comments in this letter and develop a simpler more efficient airspace solution that will benefit ALL airspace users.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Chauza", written over a horizontal line.

Ed Chauza-President
Deer Valley Pilots Association

cc:
Stacy Howard-AOPA Regional Representative
Art Rosen-AOPA ASN Representative
Tommy Thomason-Arizona Pilots Association
Gary Mascaro-Manager, Deer Valley Airport

Frequently asked SATR Questions

Where do I find the SATR NPRM? The NPRM is posted on the DVPA website

[Click here: http://www.dvtpilot.com/pdf/SATR%20NPRM%20E8-22568.pdf](http://www.dvtpilot.com/pdf/SATR%20NPRM%20E8-22568.pdf)

Attached is a PDF copy of the NPRM. It is in “mouse print” from the Congressional Record and not the easiest to read.

What is the address I respond? Send comments by **US Mail (must be received by Dec. 15)** to:

Docket Operations, M-30
U.S. Department of Transportation
1200 New Jersey Avenue, SE.
Room W12-140, West Building Ground Floor
Washington, DC 20590-0001.

For FAX: Fax comments to Docket Operations at 202-493-2251

I thought the final date was November 25 for responses? The Luke AFB proposed SATR airspace NPRM has been updated as of Wednesday, October 15, 2008. They extended the response date to December 15, 2008 and have changed the Docket number to FAA-2008-1087. This is the new number to be entered into search info on website <http://www.regulations.gov> to look at the NPRM comments.

Where can I go to look at the comments? Go to <http://www.regulations.gov> to look at the NPRM comments and type in the Docket number FAA-2008-1087. Then on each comment there is an area “view this document” and you just click on it.

Roy M. Coulliette
Send a Comment or Submission | Notification

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Agency: FAA **Document Type:** PUBLIC SUBMISSIONS **Comments Due:** Nov 25, 2008 11:59:59 PM EST
Docket ID: FAA-2008-1087 **Document ID:** FAA-2008-1087-0028
Date Posted: Dec 1, 2008

View this Document:   | 

Click to view

How do I send it electronically? Go to <http://www.regulations.gov> and follow the online instructions for sending your comments electronically. You can attach a document or you can type your response into their format. If your response is lengthy, I would suggest constructing it in your word processor and then doing a “cut and paste” into the FAA template.

Does it matter if I don't respond, I agree with the DVPA position? YES, it does matter. In the case of NPRM responses, **QUANTITY** counts. Even if you only say you oppose the proposal, it gets counted. There are responses of only one line, some are handwritten on a sheet of paper, others are on letterhead, etc. The important thing is to make your opinion count.

What is the point responding, it is probably a "done deal" already? Frankly, it's hard not to think that way sometimes. If there is little to no feedback, it is almost a given fact that no changes will be made. In the case of the SATR, we have had some effect from feedback provided in earlier letters. Originally Luke was proposing a Class B like airspace requiring a clearance. They have backed off that and are proposing a Class C like airspace. Without detailed feedback from pilots the FAA consensus will be that general aviation isn't very concerned and they can move forward with their plans. The FAA must respond to all the comments in the NPRM.

How do I address the response? Following is a sample template that you can use. Another suggestion is to look at the comments on the website and follow a format used by another responder.

December 2, 2008

Honorable Robert A. Sturgell
Acting Administrator
800 Independence Avenue, SW
Washington, DC 20591

Dear Administrator Sturgell,

I am opposed to the implementation of the proposed Special Air Traffic Rule (SATR) published in the Federal Register on September 26, 2008 (Docket No. FAA-2008-1087).

I am a pilot based at Deer Valley airport (DVT). I have serious concerns about -----

- 1) Complexity of airspace - - - -
- 2) Notification of airspace activation - - - -
- 3) -----

Very Truly Yours,

John Q Public
1234 Deer Valley Rd
Phoenix, AZ