



October 5, 2011 – The FAA is studying GA airports and plans to release a report in January 2012 that will assign all GA airports into one of five categories. GAAC staff met with the FAA Airports Office and reviewed the proposed categories and criteria for each, and shared this information with members and supporters on September 13, 2011. After reviewing the proposed categories and criteria, GAAC members raised very serious concerns about the accuracy with which those categories and criteria reflect GA airports.

As such, GAAC developed a White Paper for FAA that delineated our specific concerns and gave recommendations for changes to the criteria. **A copy of the White Paper can be found on the follow pages.**

Sharon Glasgow and Luis Loarte from FAA's Airport Office will join the GAAC webinar on October 17, 2011, to explain this process and respond to our questions and concerns.

If you are not already registered, please do so on our website's home page – www.gaairportcoalition.org.



A REVIEW OF THE NATIONAL AIRPORT SYSTEM STRATEGIC EVALUATION TASK (ASSET)

October 5, 2011

ISSUE

The Federal Aviation Administration (FAA) proposed a plan in late 2010 to re-categorize general aviation (GA) airports using a host of criteria developed by the agency and a variety of industry stakeholders. FAA plans to release its report defining new GA airport categorizations (called the Airport System Strategic Evaluation Task, or “ASSET”) in January 2012.

While claiming transparency in government as its motivation, the FAA has to date offered few concrete details about the data used and how it was evaluated. It also appears that FAA has not given adequate consideration to the overall effects a complete re-categorization might have on these important infrastructure elements of the national airport system.

As the association that preserves and promotes general aviation airports across the United States, the General Aviation Airport Coalition (GAAC) believes the most prudent action for the agency is to take a step back and slow the re-categorization process to ensure its recommendations are clear and that the data used is available to all stakeholders.

GAAC’S REVIEW

On September 13, 2011, approximately 40 GAAC members participated in a conference call to discuss ASSET. GAAC members are primarily seasoned GA airport managers and aviation specialists from around the country.

After a review of the draft categories proposed by ASSET, GAAC members raised a number of concerns about the draft categories and criteria for each. GAAC understands this is an iterative process, and sincerely appreciates the opportunity to work with the FAA to ensure these categories best represent our GA airports, their roles and how they fit into the federal and state airport systems.

GENERAL COMMENTS

A select GAAC committee initially looked at the categories we were made aware of during our limited communications with the agency. With that in mind, we believe the FAA should consider ***retaining*** the following criteria in the final plan:

- Registered and Airworthy Based Aircraft
- IFR Departures (measurable for towered and non-towered airports)
- Registered and Airworthy Based Turbine Aircraft (not only jets)
- Precision or Non-Precision Instrument Approaches
- Metro or Micro Statistical Area (data)

GAAC suggests FAA consider ***dropping*** the following criteria in the final plan:

- International or Interstate Departures
- Enplaned Passengers
- Enplaned Cargo
- Primary or Non-Primary Commercial Service
- Essential Air Service
- U.S. Postal Service use

Non-Hub Primary and Non- Primary Commercial should be included within the categories. GAAC believes that all Non-Hub Primary – such as Abilene & Ft. Worth TX, Springfield, MO - and Non-Primary Commercial service airports – such as Rockford, IL, and Lake Charles, LA - play an important role in General Aviation in addition to their role supporting scheduled passenger service. Regardless of whether the airports are primary or non-primary with scheduled airline service the FAA should take into account and identify the General Aviation roles that each of these airports play.

Additionally, GAAC recommends that FAA allow seasonal flexibility. While we do not support one-time events that might possibly skew the final numbers, we recognize the need to consider seasonal operations.

RECOMMENDED CHANGES TO CRITERIA

Regional Activity Airports

Inside a Metro or Micro Statistical Area

AND Annual Instrument Flight Plan Departures of 5,000 or more (Instrument Flight Plan departures are recommended because this is measurable for both towered and non-towered airports.)

AND 100 or more Registered and Airworthy Based Aircraft (Many GA airports harbor and count aircraft that are reported at other airports or aircraft that are habitually non-airworthy.)

AND 11 or more Registered and Airworthy Turbo-powered Based Aircraft (Turboprop aircraft have similar flight and performance characteristics as turbojet aircraft, therefore should be treated the same.)

AND Precision Instrument Approach

Or,

Outside Metro or Micro Statistical Area

AND Annual Instrument Flight Plan Departures of 5,000 or more (Instrument Flight Plan departures are recommended because this is measurable for both towered and non-towered airports.)

AND 50 or more Registered and Airworthy Based Aircraft (Many GA airports harbor and count aircraft that are reported at other airports or aircraft that are habitually non-airworthy.)

AND 5 or more Registered and Airworthy Turbo-powered Based Aircraft

AND Precision Instrument Approach

Metropolitan Activity Airports

Inside a Metro or Micro Statistical Area

AND Annual Instrument Flight Plan Departures of 1,000 or more (Instrument Flight Plan departures are recommended because this is measurable for both towered and non-towered airports.)

AND 100 or more Registered and Airworthy Based Aircraft (Many GA airports harbor and count aircraft that are reported at other airports or aircraft that are habitually non-airworthy.)

AND Precision Instrument Approach

Community Activity Airports

30 or more Registered and Airworthy Based Aircraft
AND Non-Precision Instrument Approach

Local Activity Airports

10 or more Registered and Airworthy Based Aircraft
OR Forest Service or U.S. Marshal use
OR 30 or more miles from the closest NPIAS Airport

Limited Activity Airports

Existing NPIAS Airport not meeting Group 1-4 criteria
OR Any NPIAS privately owned GA or privately owned reliever with less than 90
Registered and Airworthy Based Aircraft

CONCLUSIONS

GAAC recognizes the need to categorize GA airports, and we support making funding decisions based on those categories. However, it is imperative that the proposed categories be based upon objective criteria.

There is significant concern among GA airports that the Transportation Security Agency TSA may begin directing fresh, unfunded mandates, such as costly security requirements, at GA airports entirely based on the conclusions drawn in the final ASSET documents.

Again, while GAAC understands that ASSET is scheduled for completion with a report due in January 2012, we caution FAA not to rush this process for the sake of getting the report completed on time. The most important goal should be to get it right.

While we commend FAA's intention to promote the importance of GA airports in their respective communities, the final ASSET report may well produce unintended consequences that could affect GA airports for years to come. As such, we request that FAA roll out this report as the states roll out their system plans. That is, the agency should make the plan public and hold an open comment period to give interested parties the opportunity to see the results and provide valuable feedback knowing all the details. Each airport would know exactly where they fit in the plan and the specific data used to create the categories and criteria.

We look forward to working with FAA to ensure the categories accurately reflect our GA airport members and their constituents. Please feel free to contact me if GAAC may be of any further assistance, or should any of our concerns in this paper require additional input.

Sincerely,



Richard K. Lewis
Chairman
General Aviation Airport Coalition