



August 17, 2012

Mr. Michael J. O'Donnell
Director, Airport Safety and Standards
800 Independence Avenue, SW
Washington, DC 20591

Re: AC No: 150/5300-13, Draft Advisory Circular Establishing Uniform Standards for the Siting and Designation of Parachute Landing Areas

Dear Sir:

The General Aviation Airport Coalition (GAAC) is not currently listed as a recognized industry organization that can provide comments to Draft Advisory Circulars. Our organization has worked with the Federal Aviation Administration over the past year and was highlighted as a participating stakeholder in the recently-released study, "General Aviation Airports: A National Asset."¹ We represent approximately 100 general aviation airports in 31 states, and on behalf of GAAC, I write to express serious concerns regarding the Draft Advisory Circular Establishing Uniform Standards for the Siting and Designation of Parachute Landing Areas (PLA). I hope you will consider these concerns as you finalize AC No: 150/5300-13.

One size does not fit all. Our first concern with the draft advisory circular is that it presupposes that there *should* be a uniform policy requiring the designation of PLAs at all NPIAS airports. It is our firmly-held belief that, notwithstanding the requirement that any airport that accepts federal funding is obligated to make the airport facility available to all aeronautical activities (including parachuting or skydiving), the use of the airport for sport parachuting and skydiving should continue to allow the local airport sponsor to have input into whether sport parachuting and skydiving will adversely and significantly affect the smooth operation and economic needs of the individual airport. In support of the long-standing policy of having local airport input in these decisions, I cite FAR Part 105.23, which requires a parachute operation to seek prior approval from the management of the airport.² For example, if an airport determines that sport parachuting will cause inbound aircraft to use alternate airports and would be, therefore,

¹ http://www.faa.gov/airports/planning_capacity/ga_study/media/2012AssetReport.pdf

²

- a. § 105.23 Parachute operations over or onto airports. No person may conduct a parachute operation, and no pilot in command of an aircraft may allow a parachute operation to be conducted from that aircraft, over or onto any airport unless—
- (a) For airports with an operating control tower:
- (1) Prior approval has been obtained from the management of the airport to conduct parachute operations over or on that airport.
 - (2) Approval has been obtained from the control tower to conduct parachute operations over or onto that airport.
 - (3) Two-way radio communications are maintained between the pilot of the aircraft involved in the parachute operation and the control tower of the airport over or onto which the parachute operation is being conducted.
- (b) For airports without an operating control tower, prior approval has been obtained from the management of the airport to conduct parachute operations over or on that airport.

detrimental to its revenue stream, the airport should be allowed to seek an exception from the requirement to allow sport parachuting and skydiving.

Safety. Secondly, the draft advisory circular would create contradictory safety rules. Allowing airport sponsors to determine the optimal level of operations among all classes of aeronautical activity at their airports has been a long-standing and effective FAA policy. Grant Assurance 22 (cited in Chapter 14, “Restrictions Based on Safety and Efficiency Procedures and Organization,” of the Airport Compliance Manual, FAA Order 5190.6B), which mandates economic nondiscrimination among all classes of aeronautical activity, has always provided for reasonable exceptions to the requirement: “the airport sponsor may prohibit or limit any given type, kind, or class of aeronautical use of the airport if such action is reasonable and necessary for the safe operation of the airport or necessary to serve the civil aviation needs of the public.”

Furthermore, the new PLA requirement may create contradictory rules that will create safety hazards. For example, an airport’s hold short lines for aircraft must be 250 feet from the runway centerline (200 feet from runway edge), yet the draft advisory circular would allow sport parachuting activities 48 feet from runway edge. In other words, if an airport maintenance person inadvertently walks across an airport hold short line, he has committed a pedestrian deviation, but a parachutist landing 49 feet from the runway would be within accepted FAA policy. Is this not creating at the least contradictory policies and at worst a serious safety hazard? By requiring PLA designations, we are in essence encouraging the establishment of sport parachuting activities. What are the limits of our airport’s liability when an accident happens on or near the PLA or on or off the airport? In the worst case, a parachute doesn’t open; the parachutist panics and doesn’t deploy a reserve parachute; the parachutist lands on a vehicle on a nearby interstate highway killing the vehicles’ occupants. What are an airport’s liabilities for inviting this activity? We urge FAA to solicit input from the Runway Safety Action Team on these issues.

Thank you for your attention to our concerns on this important issue.

Respectfully,

A handwritten signature in black ink, appearing to read "Richard Lewis". The signature is written in a cursive, flowing style.

Richard Lewis
Chairman
General Aviation Airport Coalition
1130 Connecticut Avenue, NW
Suite 300
Washington, DC 20036