March 19, 2012

Mr. Michael J. O’Donnell
Director
Federal Aviation Administration
Office of Airport Safety and Standards (AAS)
800 Independence Ave. SW
Washington, DC 20591

Dear Mr. O’Donnell:

The Aircraft Owners and Pilots Association (AOPA) represents the interests of over 400,000 members nationwide. The Association’s membership includes individuals who participate in all areas of aviation activity. AOPA is committed to ensuring the operational safety and the future viability and development of general aviation airports and their facilities as part of the national and state transportation system.

We are writing to express our serious concerns regarding the proposed update to the Federal Aviation Administration’s (FAA) Airport Design Handbook, Advisory Circular (AC) 150/5300-13. Specifically, we are concerned with the draft language proposed to be included in the AC which will be incorporated as Appendix 18 relating to Parachute Landing Areas (PLA) Standards.

It appears to us that once again, the agency is embarking on yet another “one size fits all” strategy in creating standards. It is our opinion that such a direction is not appropriate for an industry that has an excellent safety record. In fact, we are unable to locate any statistical information that would lead us to believe that there is indeed any problem with existing PLA’s on airport properties.

While we can understand the agency’s desire to establish standards, and to mitigate any possible safety issue that may occur in the future, we also do not believe that such activity can be undertaken without having a detailed and in-depth understanding of how this segment of aviation actually operates on an airport or how the proposed changes would impact those existing operators. We would be interested to know if anyone from the FAA Airports office has taken the opportunity to visit some of the existing parachute operators with PLA’s on an airport to determine how they operate and the procedures they have in place to keep safety at high levels.

It is also our understanding that your office has had discussions with the United States Parachute Association (USPA) regarding the proposed inclusion of Appendix in the AC. USPA can and should be a significant technical resource to the agency in developing this appendix. We urge you to give USPA suggestions due consideration.
Implementation of these mandatory standards will likely have a significant impact on existing parachute jump operators. Creating standards that essentially have the potential to force existing businesses to close their operation or add extensive costs to their business should be avoided — especially if these operators have an excellent safety records.

AOPA encourages the FAA to reconsider the need for this addition to the AC. In any event, the FAA must carefully consider the potential detrimental effects and associated costs these proposed PLA standards would have on an industry and on existing operators that have an excellent safety record, compared to the minor benefits that might be realized from such standards.

Sincerely,

Bill Dunn
Vice President
Airport Advocacy