USPA Needs Your Help to Prevent New FAA Requirements for Parachute Landing Areas!
On July 3, most USPA members received an e-mail from USPA to inform skydivers as quickly as possible about the July 3 Federal Register notice concerning the FAA’s proposal for a new parachute landing area (PLA) standard. The purpose of this July 16 issue of the USPA Update is to provide more background information and to expand on the issues that we think are important for skydivers to address in their comments back to the FAA.

Linked Resources
The Federal Register notice can be found here, the FAA draft appendix can be found here, and the July 3 PLA e-mail that was sent to all members can be found here.

Background
Leading up to 2010, USPA sought to help potential skydiving operations that were being denied access to airports in receipt of federal funds. Those airports are obligated to treat all aeronautical users (including skydiving) equally and fairly. USPA engaged the Federal Aviation Administration to bridge a lack of cooperation between its Flight Standards and Airports divisions with respect to skydiving denials by these airports. With some DZ proposals, Flight Standards would say the airport could safely accommodate skydiving, but Airports would disagree, leaving the proposed DZ in limbo. In January 2011, FAA Airports presented the concept of developing an FAA-recognized parachute landing area standard as a “solution,” thinking that many, if not most, airport denials are based on an airport manager’s assertion that a DZ “can’t fit” on the airport (in actuality, this is not the basis for most denials). The FAA felt that a PLA standard would benefit skydiving but that it also addressed a safety need. From the start, USPA expressed concern that an FAA standard PLA wasn’t a panacea, and in fact it could cause more problems than it solved. And we pressed the FAA to provide any data that showed there was a safety problem with skydivers landing on airports.

Over the intervening year and a half, the FAA shared studies, concepts and eventually proposals with USPA. At every opportunity, USPA provided detailed and researched comments, concerns, objections and suggestions. There were literally dozens of voluminous e-mails, long phone conversations and several meetings. These three USPA letters here to FAA Airports conveyed much of our concern and approach. USPA input resulted in some beneficial modifications. Initially the FAA considered disallowing any PLA within any runway and taxiway safety area. That did not make the proposal. Neither did the FAA concept of having all PLAs no closer than 40 feet to any airport pavement.

USPA met with staff of the House Aviation Subcommittee about the FAA PLA initiative, and shortly after that meeting, House Transportation Committee Chairman John Mica sent a letter here to FAA Acting Administrator Michael Huerta, requesting any supporting accident data. Within days, FAA Airports requested an internal data run of “skydiving” incident reports, and on March 13, 2012, USPA received three groups of accident reports here, most of which have little connection with landing areas. We rebutted the reports with USPA analysis here on March 21, 2012.
At USPA's request, there was a final meeting on April 20, 2012, with FAA Associate Administrator of Airports Christa Fornarotto and various FAA officials, at which point the FAA asserted that it was firm in its justification and proposal, which would go out for public comment.

USPA Concerns and Points for Comments
Following are specific points that USPA has raised and that individual commenters can use and elaborate on in their comments.

FAA's three data runs of 27 incident reports provide no safety justification for an FAA PLA standard. Several of the reports have no relation to parachutes landing on airports. The few that do require more information and analysis before the FAA can assert that an FAA-compliant PLA would have changed the outcome.

Prohibiting PLAs from overlapping taxiways is not warranted. For decades, a number of DZs have used USPA Basic Safety Requirements-compliant landing areas that overlap taxiways, with little problem. Taxiways are a slow-speed environment; pilots are taught to taxi no faster than they can walk. Skydivers are taught to avoid pavement and aircraft. USPA cannot document a single collision between a skydiver and an aircraft moving on an airport surface.

PLAs that are displaced from their current location near the DZ facility would likely result in skydivers walking across or operators shuttling across runways or taxiways. This may result in runway or taxiway incursions with aircraft that could pose more danger to pilots and skydivers than the current practice of landing near a taxiway.

FAA's definition of hazards wrongly includes runways and taxiways. All the other hazards listed are true hazards to skydivers, but runways and taxiways are not hazardous to skydivers, although skydivers prefer not to land on them. FAA's inclusion of runways and taxiways as "hazards" is simply a semantics mechanism used to try to separate them from PLAs.

FAA's proposal to mark PLAs is unnecessary. Skydivers know where the PLA is and marking will not aid pilots in finding the PLA. Pilots should be scanning the airspace for skydivers and other air traffic, not looking at the ground.

FAA is creating unnecessary, burdensome federal bureaucracy. The proposal will require FAA review and approval of the FAA-standard landing area. By the FAA's own admission, the approval could take one to two months, possibly more. How will that affect airport invitations for skydivers to jump into the local fly-in pancake breakfast, or the nearby DZ that needs to temporarily relocate due to runway flooding or fuel outage?

FAA is inappropriately usurping an airport manager's authority to approve skydiving on the spot. Federal Aviation Regulation Part 105 currently gives airport management full authority to approve skydiving on their airport; skydiving can commence within minutes of verbal management approval. The proposal removes an airport manager's authority.

Please Submit Comments
The Federal Register provides the following mailing address for comments:
Federal Aviation Administration
800 Independence Ave. SW
AAS-100, Room 621
Washington, DC 20590

The FAA has also agreed to also take comments by e-mail to khalil.kodsi@faa.gov. Comments are due by August 17. USPA urges all skydivers to mail or e-mail your concerns and comments before that deadline. Please copy USPA with your comments by e-mailing them to govrelations@uspa.org.