

Ladies and Gentlemen:

These comments are made with great care to inform you how your regulations affect pilots and airport owners and managers. I understand the impossible task your agency has been faced with since the September attacks, trying to get policies and procedures passed on our behalf while trying to educate and converse with the security agencies who have over reacted and continue to do so. Please understand that I hold no animosity for the FAA, but sympathize deeply with the position you are in today. With that being said, I would like to make the following observations and responses to SFAR described in Docket FAA-2002-11580.

The FAA cannot enforce or implement the current restrictions. The first indication of this occurred 2 days after the attacks. Flights were being permitted that were reported as "charter" or "lifeguard" flights with absolutely no verification. This was extremely disappointing. FSS should have available a database to verify aircraft N#'s and pilots designated on the company charter certificate that FAA has taken quite a lengthy and involved process to certify. The procedure for the 3 airports will have the same problem with the authorization and verification process. Without 24 hour security verifying the identity of every pilot in every departing aircraft, how will the FAA ensure that the individual providing the "pin" in an aircraft cleared in the security verification check will be that pilot on the list?

The second indication that the FAA had inconsistent application of the new restrictions was the NOTAM permitting instrument flight procedures in the 18nm to 25nm arc of the new Washington TFR. Pilots were prohibited from closing their IFR flight plans prior to landing at the airport. Numerous pilots reported that ATC was having them close their flight plans in the air in an effort to reduce the workload on ATC. Other pilots reported to me that ATC vectored them right through the TFR instead of around it. It was very obvious that the enforcement of the IFR restriction was dependant upon the time of day, which controller was working you, and of course, the weather!

The third indication that the FAA was having problems in implementing the restrictions was the lack of information supplied by FSS. On 2 occasions, pilots flew into GAI from other states completely unaware of the Washington TFR and the then current IFR restrictions. These pilots flew VFR and the NOTAMS regarding the DCA TFR were not disclosed to them during their preflight weather briefing or filing of their flight plans. The pilots reported this to me after learning about the restrictions. I had no call from ATC inquiring about the aircraft that had flown into the TFR without IFR clearance.

ATC isn't able to function this way. It is well known that controllers are using equipment that is outdated by half a century and that the additional aircraft filing instrument flight plans overloaded the Dulles, Baltimore and Washington centers. A change in shift at a controller desk meant you could or could not cancel a flight plan in the air, fly VFR, or enter the TFR.

The procedures outlined in the SFAR will make it much worse on an already overloaded ATC system and provide no relief to the communities who have been adversely affected economically. Specifically, the tenancy at College Park Airport has been reduced from 90 tenants prior to 9/11/01 to 35 today. No transient activity has been authorized and airports cannot survive without the contribution that transient activity provides. In addition to its annual "Air Fare" College Park has had to cancel 3 additional national fly-ins this year. These conventions allow visitors to purchase aviation fuel, pay for transient

parking, use restaurant facilities, rent cars, stay in local hotels, etc. These airports have not been "opened." The economic impact these airports provide their local communities has not been improved. Transient activity is the life-blood of airports. Some provision for the growth of these airports needs to be explored. How will airports acquire new tenants?

The pilots who are citizens of the U.S. are not terrorists. Few individuals are willing to be fingerprinted and/or background checked when they have lived at these airports for years, and are promised civil rights by the Constitution of the United States.

The restrictions will prove to economically kill the airports in an attempt to lead the public in another false sense of security. Who is watching? Why is there still a TFR around Washington, DC? There is no point. No one is going to authorize the "shoot down" of any aircraft over the residences in the metropolitan area while ATC's struggling system continues to vector traffic over the Vice Presidents home. That aircraft was allowed to continue to its destination without a forced landing at Dulles to ensure the security of the airliner?

Restrictions should be enforceable, timely, but more importantly effective. Nothing that has been done to date would prevent the attacks of 9/11/01. Pilots, citizens of the United States are having their rights removed and I am concerned that the specific activities as outlined in the SFAR will snowball into the demise of general aviation. Our pilots contribute to the economy, fly our airliners, fly our military aircraft and charter businessmen and political figures from place to place in a timely manner. That is what aviation was designed to do!

I recommend that the SFAR remain temporary, no final rule implemented. It needs to be looked at again in 90 days.

Respectfully submitted, Wendy C. Carter, Airport Manager, GAI