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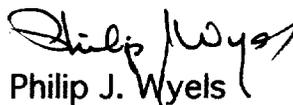
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Docket No. FAA-20022-14149 - 10
U.S. DOT/FAA - Notice of Proposed Rule Making (NPRM)
Special Flight Rules in the Vicinity of Los Angeles International Airport
Dated 12/31/2002

Comments On the Above NPRM:

1. § 93.95(d). Replace the original wording "... navigate via ..." with "...operate on..." and deleting "... remaining between the San Diego Freeway and the Pacific Ocean shoreline at all times" results in a very significant reduction of in flight safety. The existing flight path lateral width is 3.8 miles at the southeast boundary and 3.7 miles at the northwest boundary. The present wording allows the full width to be used to transit the Special Flight Rules Area (SFRA) as long as the SMO 132° radial is used for navigation.
2. The NPRM wording, operate on, requires a transiting aircraft to be flown within a lateral path width of 1.25 miles at the southeast boundary and 0.73 miles at the northwest boundary. [Assuming the standard combined accuracy of the VOR transmitter and aircraft receiver of +/- 3 degrees.] The lateral width of the area as proposed is reduced by 2/3 at the southeast end and 80 % at the northwest end.
3. The Special Flight Rules Area (SFRA) would effectively become a corridor not an area. The possibility of in-flight head-to-tail collisions is greatly increased when multiple aircraft of different airspeeds and different wing configurations are transiting the corridor at the same altitude. A similar condition will occur when aircraft are changing direction or altitude upon entering or leaving the corridor. The lateral room to sidestep will be greatly reduced.
4. It is requested the wording in § 93.95(d) remain as present.
5. § 93.93. Changing the northwest boundary from following Ballona Creek to following Manchester Blvd. increases the lateral width of the SFRA at this end from 3.7 miles to 5 miles. The change provides more freedom for VFR aircraft operating northeast of the SFR to change direction and altitude of flight. The writer considers this a desirable change.

Thank you for your consideration.


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