

I propose that Part 91.117 Aircraft Speed paragraph (c) be amended as follows: No person may operate an aircraft under VFR in the airspace underlying a Class B airspace area designated for an airport or in a VFR corridor designated through such a Class B airspace area, at an indicated airspeed of more than 200 knots (230 mph). Note that I propose adding the words "under VFR" after the word "aircraft". This change would allow operation of an aircraft under IFR at up to 250 knots. The reasons for this proposal are as follows: 1. While flying IFR in or under the Class B it is always difficult and sometimes almost impossible for the pilot to know when he is in or under the Class B. For example, many of the boundaries of the LAX Class B airspace are not fixed by electronic nav aids. You obviously cannot see ground references while in IMC, and some parts of the Class B airspace are over the ocean. The only way to know is to ask ATC and often they are too busy with higher priorities. 2. Determining when under (rather than in) the Class B airspace is a significant continuing additional workload on the pilots, and an additional workload on ATC if they are asked. 3. Pilots who are diligent about complying will slow to 200 knots any time they are close to being under Class B airspace (including when they are in Class B airspace but may descend out of it). This unnecessarily slows traffic flow, may interfere with ATC sequencing when an aircraft unexpectedly slows, and costs money and wastes fuel by extending flight time. 4. The regulation is unnecessary since all IFR traffic is under ATC control and ATC can specify whatever speed less than 250 knots that they require. Thank you for this opportunity to comment.