

DEPARTMENT OF TRANSPORTATION
Federal Aviation Administration (FAA)
[Docket No. FAA-2004-16944]
OPERATING LIMITATIONS AT CHICAGO O'HARE INTERNATIONAL AIRPORT
by The Alliance of Residents Concerning O'Hare, Inc. and
The American Working Group for National Policy, Inc.

August 8, 2004

As a resident of East Boston, Massachusetts and long time adjacent resident to Logan International Airport and as one of the founding members of the Citizens Advisory Committee to the Massachusetts Port Authority, I would like to add my full support to the comments below and add:

The critical issue of climate change, the dwindling supply of oil, the dependence of the airlines on this supply and amount of damage that airplanes do to the atmosphere, human health and well being must be factored in into any assessment of expansion at any airport. Until this is done and every other avenue to reduce flights and congestion, no expansion at any airport should proceed.

Previously submitted letter, August 4, 2004:

The American Working Group for National Policy, Inc. (AWGNP) and the Alliance of Residents Concerning O'Hare, Inc. (ARECO) are officially submitting the following testimony to the problems and solutions regarding the expansion and overcrowding of Chicago O'Hare airport:

One recent reason O'Hare is overcrowded is because American Airlines increased connecting passenger activity, when it stopped all connecting activity at their St. Louis hub.

Combined with United Airlines, O'Hare has over 50% connecting passengers, plus significant amounts of connecting cargo and mail. Eighty-eight percent of the total passengers at O'Hare are United and American.

The Federal Aviation Administration (FAA) should rule that not more than 35 or 40% connecting traffic could be handled at O'Hare, which would reduce delays. These airlines should not be allowed to monopolize the capacity at O'Hare and reduce or eliminate low cost and regional airlines that provide point-to-point service.

The legacy airlines cannot compete price wise with the point-to-point carriers and are trying to use the power of the federal government to restrict or diminish other airline activities at O'Hare, where they currently dominate passenger activity.

Connecting and transfer passengers could be off-loaded and siphoned off to other airports in the system. Airlines purposely over schedule flights, more than an airport is capable of handling; thus, guaranteeing systemic delays, in order to monopolize airport landing-takeoff slots and increase the perception of need for airport expansion at the public's cost.

Airline domination of other airports like Atlanta, where Delta Airlines has 80% of the business, is also incurring major delays. The hub and spoke system is being overrun by low cost and regional airlines, which is generally good for pricing and competition in the long run.

Reportedly, FAA's Marion Blakey has wrongly alleged that the long-term solution is the proposed \$15 (sic) billion rehab of O'Hare; when, in fact, according to a federal study, it will further exacerbate existing near and long-term capacity problems.

Addressing Blakey's claims; there are many problems with rehabbing the duel fortress hub of O'Hare, among them are:

- 1-According to its own and independent figures, it will increase all-weather delays.
- 2-According to Chicago Air Traffic Controllers and the Department of Transportation (DOT) the plan will decrease runway and airspace safety.
- 3-An audit shows the true costs of published O'Hare expansion projects to be approximately \$67 billion (Sixty-seven billion dollars!).
- 4-O'Hare airport-associated operations now cause significant damage to the health of over 5.5 million people living near O'Hare.
- 5-Just the costs of O'Hare related cancers amounts to \$8 billion annually alone.
- 6-A U.S. General Accounting Office study recommends not to expand O'Hare for our long-term capacity needs but rather, to modernize our whole transportation system, which would in turn modernize O'Hare intermodally.
- 7-Jets are a major cause of climate change and governments and the United Nations are being called on to reduce flights and develop alternatives in order to head off future calamity.
- 8-Commercial jet aviation has sustainability problems due to its dependence on oil.

It is important to point out the major solution to immediately relieve airport delays nationally, is the need to reinstitute slot controls (High Density Rule) at the four critical airports*; Congress effectively eliminated slot controls via AIR-21**.

Amidst much controversy, certain legislators, influenced by the air transportation industry, removed the HDR, despite the dire delay and congestion predicted warnings expressed in the U.S. DOT's Report to Congress on the High Density Rule (1995), in order to give the appearance that more runways and airport expansion was needed, nationwide.

Consequently, further entrenching the major airline's control of the major hubs and also, aviation's monopoly over our U.S. transportation system; thus, squashing the demand and especially, resources for better alternatives such as transfer Wayports and a world-class, national high-speed rail system.

One of the key questions that AWGNP and AReCO has is "Why aren't the managements of other competitive nationwide airports, including proposed new airports (e.g. south Chicago suburban airport), invited to the meeting to discuss solutions, particularly those nearby airports that could offload passenger and cargo transfer traffic (e.g., Mid-America, Lambert, Rockford, Gary, etc.)?" These managements have a strong vested interest in this problem and could bring near instant relief to the fabricated delay problems at hand. Why dicker with a few percent rescheduling when these other airports could immediately begin offloading 10-50% of O'Hare transfer traffic?! Of course, Chicago's Mayor, along with the airlines, will claim that such actions are

"unworkable", to which the DOT should state "baloney": they were just doing so at Lambert (American) for example!

Two major Congressional supporters of the High-Density Rule are Congressman Henry J. Hyde (IL-R) and U.S. Senator Peter Fitzgerald (IL-R), who fought staunchly against its removal. Immediately re-establishing the HDR would better distribute flight operations and at once, relieve delays. Also, the DOT/FAA should immediately begin to allocate 50% of all PFC's to NEW airport facilities rather than to continue to use such funds to attempt to maintain the dominions of existing land-locked and outmoded airports such as O'Hare.

* Chicago's O'Hare, New York's Kennedy and LaGuardia and Washington Reagan-National

** Aviation Investment and Reform Act for the 21st Century