

# **Comments Regarding Docket No. FAA 2008-0036 Policy Regarding Airport Rates and Charges**

Prepared and submitted by  
Dr. I. Richmond Nettey  
Associate Dean, College of Technology  
and  
Lannie Megan Marsh  
Graduate Assistant, Aeronautics Division

On behalf of the  
Aeronautics Division  
117 Van Deusen Hall  
College of technology  
Kent State University  
Post Office 5190  
Kent, Ohio 44242  
330.672.9476  
inettey@kent.edu



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Charles Erhard, Manager  
Airport Compliance Division, AAS-400  
Federal Aviation Administration  
800 Independence Avenue, SW.  
Washington, DC 20591

Dear Mr. Erhard,

Following are comments submitted on behalf of the flight education program at Kent State University pertaining to Docket No. FAA-2008-0036. Amendments to the "1996 Rates and Charges Policy" proposed to use landing fees to provide an incentive for air carriers to use airports at less congested times, or to use alternate airports. While airport congestion has increasingly become a problem, it appears that only one of the proposed amendments may be beneficial, while the other two changes would cause negative impacts that exceed any benefits to the General Aviation (GA) community.

The implementation of a two-part landing fee structure, consisting of an operation charge and a weight-based charge, would have a negative impact on GA pilots who operate non-revenue flights whose costs are direct out-of-pocket expenses of most GA operators on training flights. This amendment is intended to serve as an incentive for air carriers to use larger gauge aircraft and increase the number of passengers served with the same or fewer operations; while this may be possible for some of the larger, more established air carriers it would harm smaller aircraft. When air carriers are charged higher landing fees and the flights are still not full, the air carriers could pass along the increased cost to the passengers through increased ticket prices.

Speaking as a participant of General Aviation, this change would cause more harm than benefit to the GA community. GA aircraft are often smaller in size and the pilot is not generating revenue for their flight, all costs come out-of-pocket. To charge a two part landing fee will increase the cost of operation through the addition of an operation charge.

There are many different types of runways at an airport (longer, shorter, parallel, intersecting, etc). Rather than changing the landing fee structure, the airport could segregate traffic onto different portions of the airfield. In the proposed amendment to the “1996 Airport Rates and Charges” it is argued that the operation of smaller aircraft during periods of congestion reduces the airport’s efficiency. It is argued that it takes more operations to move the same number of people to and from an airport, the smaller aircraft travel at slower speeds than larger jets, and the greater separation difference from larger jets increases congestion. Rather than changing the fee structure, congestion could be reduced through modified traffic patterns, directing of traffic to runways specific to the airplane size and runway requirements, and the publishing of information regarding airport congestion. If the traffic patterns were specific to separate areas of the airfield, conflicting traffic should be able to maintain proper separation to reduce separation problems. Also, smaller aircraft should be directed to the shorter runways on the airfield, where larger jets cannot land on. Rather than allowing the smaller aircraft to land on the same runways that jets need and use, slower, smaller aircraft could be segregated. It may be common knowledge that airports are busier during certain times throughout the day, but the publishing of peak congestion periods may also help relieve the problems. When a pilot calls for a briefing, the briefer gives information about items such as weather, or NOTAMS but he/she does not recommend using another airport due to forecasted congestion during the planned time of arrival. If pilots knew

that the airport will be busy, and will possibly have to enter a holding pattern or experience some other diversion, the pilot may choose to modify their flight in order to reduce delays.

Airport Operators should be allowed to include in the airfield fees of a congested airport a portion of the airfield costs of other, underutilized airports, either reliever or secondary airports. Congestion is a big problem at airports, especially those serving more popular locations. To reduce congestion there must be some incentive for air carriers and other air traffic to use alternate airports.

Since it is believed that much congestion is caused by the smaller, slower aircraft this would prove beneficial to both large air carriers and smaller, budget air carriers. By diverting some traffic to other airports, especially the budget carriers, flights would not have to be reduced allowing air carriers continue providing the same amount of services. In turn, budget air carriers could offer flights at a reduced cost to another nearby airport.

It is often the case that GA aircraft land at secondary airports by choice, or through the direction of air traffic controllers. These airports are typically located further away from the downtown portion of a city, and provide fewer amenities. Since the airlines are increasing their services to make a profit, they should also help carry the financial burden for the inconvenience that is placed on other air travelers. In the case that GA travelers choose to land at the congested airport they will be doing so with full knowledge of the costs.

In regards to the proposed amendment regarding the costs of facilities under construction neither of the proposed changes received favorable support. Construction on an airfield is likely to increase congestion. It would not be fair to charge users a higher landing fee for facilities that they are not currently able to use. The construction will only benefit those users who intend to

continue to use the facilities in the future, after construction is complete. Additional landing fees should only be assessed after completion of the construction.

Congestion at airports may be reduced, but will probably never be eliminated. The United States has become increasingly dependent on air travel for the transport of people, cargo, mail, etc. With continued economic development, the demand for air service will continue to increase, while the land surrounding airports continues to be developed. A day will come where airports will be built far outside of cities where there is more land, and travelers will have to seek ground transportation to reach their destination. The modification or addition of landing fees should be done out of necessity, rather than to inconvenience some to make it easier on others. Furthermore, the modification of landing fees must always make ample accommodation for educators who are preparing the future generations of pilots and operators of the National Airspace System.

Sincerely,

I. Richmond Nettey and Lannie Marsh

Aeronautics Division, College of Technology, Kent State University.