

AOPA has been working closely with the FAA for ten years on problems arising from high speeds in the airspace. With the introduction of jet aircraft into the air carrier fleet, the Agency placed certain equipment requirements on their high altitude operation, provided traffic advisory service to them and designated positive control airspace on both a route and area basis. The optimum cruising altitudes for jet aircraft are above FL 240 and the closure speeds indicate that the pilot is not able to avoid collision satisfactorily without assistance from ground radar. AOPA supports this view.

Since 1958, AOPA has consistently recommended to the FAA and to the Congress that ways and means be developed for control of VFR traffic in areas which might require positive control for high speed aircraft. AOPA's position on this matter has not changed. This NPRM indicates that this requirement for general aviation has been satisfied because a separate action proposes an amendment to Part 91 of the FARs which would permit CVF in positive control airspace. This action, however, gives only lip service to AOPA's requirements. The sole concession to the rigid requirements for IFR operation in positive control airspace is that the pilot need not have a current instrument rating. The aircraft itself must have all the sophisticated operating equipment required for jet aircraft flight except a DME. AOPA will have detailed comments on the inadequacies of the proposal in its response thereto.

The subject proposal states that the "FAA now has the capability to provide positive control service in the proposed area *with its present resources* and without undue hardship to the users." It also states that "Because of the additional safety provided by positive control, it is proposed to lower the floor of the positive control area to 18,000 feet MSL within the airspace described herein." AOPA has strong doubts concerning the validity of both statements. Our reasons are as follows:

(1) In 1961, air traffic control operated 36 centers with 6,349 controllers, 49 radars, 50 beacons and handled 9,697,417 IFR operations. This was performed, so far as positive control was concerned, along 7,297 miles of intermediate altitude positive control jet routes and 77,950 miles of jet routes. Area Positive Control between 24,000 and 60,000 feet MSL was implemented in 1962 over practically all of the 48 States. In 1966, air route traffic control operated 28 centers with 6,573 controllers, 88 radars, 89 beacons and handled 13,534,883 IFR operations. There were 96,935 miles of jet routes.

This means that the number of control personnel has increased 3.84%; the number of radar systems he has to watch is up 79.59%; the beacons by 78.00%; the overall IFR activity is up 39.57%; the numbers of radar and beacons per controller up about 73.0% BUT the IFR activity per controller is up a whopping 35.84%. On the other hand the activity per radar per controller is down by 24.92% which means that as the radar coverage went up and the traffic increased, the control personnel were spread thinner and thinner and the cost of each operation in terms of facilities mounted astronomically.

The NPRM states, inter alia, " * * * predicts a 61 percent increase in scheduled air carrier aircraft and 504 percent increase in general aviation aircraft." The FAA publication "En route IFR Air Traffic Survey" for FY 1965 reports peak-day activity between 18,000 feet MSL and 35,000 feet MSL of 2,639 air carrier and 177 general aviation aircraft. Projecting these figures to 1970 by the FAA's own prediction would indicate an annual workload, in addition to normal increases in other altitudes, of 15,608,120 more air carrier and 9,271,730 more general aviation IFR operations in the positive control system, or a total increase of 24,879,850. This is almost twice the number of IFR aircraft handled during CY 1966 in the entire ATC system. These are peak-day figures and it is well-known that right now the present ATC system becomes overloaded with this amount of activity, breakdowns frequently occur and serious delays build up. There is no evidence extant of any FAA planning to handle air traffic loads of approximately three times the volume of present loads within less than three years. There is no evidence now that the FAA ATC system could cope with the traffic loads which would accrue with the proposed lowering of positive control areas to 18,000 feet MSL. If the FAA takes on this task through arbitrary rulemaking, it must be prepared to assume the responsibilities and liabilities which are inherent to such an undertaking.

In view of this analysis, it appears the workload on the control personnel is reaching the breaking point. This is a national figure. To add to this