

August 18, 2020

Shawn M. Kozica
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FAA Western Service Center
2200 South 216th Street
Des Moines, WA 98198



RE: WRITTEN COMMENTS PERTAINING TO THE PROPOSED DECOMMISSIONING OF THE CHANDALAR LAKE NONDIRECTIONAL BEACON

The Alaska Airmen Association is a General Aviation organization that represents close to 2000 members. Our mission is to “Protect, Preserve, and Promote General Aviation in Alaska.” Membership includes pilots, mechanics, aircraft owners, and others that have an interest in aviation. On behalf of our members, please accept the following written comments on the proposed decommissioning of the Chandalar Lake (CQR) Nondirectional Beacon (NDB).

The Alaska Airmen Association does not support the decommissioning of the Chandalar Lake Nondirectional Beacon.

The Alaska Airmen Association is in a quandary over the more significant problem of the crumbling low-level airway architecture statewide. It is difficult to imagine that in this world of space-based navigation that we are losing capabilities for non-icing, non-pressurized, piston-powered aircraft to operate in the IFR environment. There is still a significant amount of infrastructure tied to these “legacy” navigation aids. For many years, aviators have been allowed to substitute the NDB navigation signal with an approved Global Positioning System (GPS) source with great success. The substitution of GPS has resulted in better accuracy of position throughout Colored and Victor Airway segments of the National Airspace System (NAS) and safety has been enhanced.

Thus, the Alaska Airmen Association is willing to accept dwindling numbers of operational NDB stations.

However, the FAA’s insistence that when a legacy navigation aid, like CQR, is decommissioned, the associated legacy airways must also be decommissioned is troubling to the General Aviation community and is in our opinion a net loss of safety.

The legacy routes were instituted with known communication and surveillance gaps many years ago. It was an acceptable trade-off because of the safety benefit the airways brought for terrain avoidance at altitudes low enough to reduce icing hazards and to stay out of oxygen requirements.

These new routes replacing the legacy airways are based on the current FAA safety standards, which do not permit gaps in communication or surveillance. To not have gaps in coverage, the Minimum Enroute Altitudes are raised until there is complete communication and surveillance coverage. This forces marginally capable aircraft into higher and higher altitudes to get to the airways, which puts us in potential danger and is beyond the risk and safety threshold of most of our membership. As a result, it is often safer to “scud run” than try and operate in the IFR environment.

Until the FAA doctrine of no gaps is changed, or there is increased coverage in communications and surveillance in the legacy route altitudes, the Alaska Airmen Association can not support the decommissioning of any anchoring legacy navaid.

It is unfortunate that the FAA can not clean up the environmental hazard at CQR without formally decommissioning the site, thereby triggering a cascade of safety issues for Alaska Airmen Association members.

Sincerely,

Adam White
Government Affairs