

## National Air Carrier Association

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April 19, 2013

Honorable Frank LoBiondo  
Chairman  
Subcommittee on Aviation  
Committee on Transportation and Infrastructure  
2251 Rayburn House Office Building  
Washington, DC 20515

Honorable Daniel Lipinski  
Ranking Member  
Subcommittee on Aviation  
Committee on Transportation and Infrastructure  
2251 Rayburn House Office Building  
Washington, DC 20515

Dear Chairman LoBiondo and Ranking Member Lipinski,

The passenger carriers of National Air Carrier Association<sup>1</sup> (NACA) have significant concerns about the Federal Aviation Administration's (FAA) plans to close up to 149 contract towers across the country due to budget cuts required in Sequestration. These proposed closures will disproportionately affect smaller towns in rural areas. This move to close these towers could dramatically reduce the safety of flight operations in these areas for air carriers and the traveling public.

These proposed tower closures by the FAA have received tremendous attention from various levels of government, as well as from airports and airlines. This attention is well deserved and perhaps the risk is not fully understood by FAA headquarters in Washington, DC. While the towers slated for closure are typically those with fewer than 150,000 annual operations, the operation of dissimilar aircraft types in the pattern is a significant risk. Beyond traffic separation, we believe that an operational tower serves as mitigation for risk in that it provides pilots up-to-date weather and braking action reports, information and clarification on airport conditions, and immediate assistance in the event of a non-normal or emergency situation. Therefore, the risk calculation is not simply one of traffic count, but the multi-faceted service a tower provides as an enhancement to safety. The FAA's assessment is incomplete and needs to address the comprehensive risk picture and take into

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<sup>1</sup> Air Transport International, Allegiant Air, Atlas Air, Miami Air, North American Airlines, Omni Air, Sun Country Airlines, and World Airways.

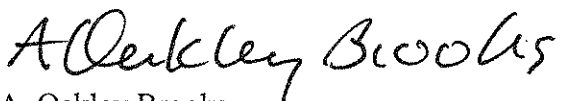
account those airports that benefit from commercial service, as they have a responsibility to the safety of the flying public.

Another important aspect of this issue is the potential legal liability the United States government faces if they abdicate their responsibility in permitting these towers to close and an accident occurs. The FAA is responsible for maintaining the safe operation of air traffic across the country. Willfully not funding the operation of these towers could lead to an air traffic related accident for which the FAA could be implicated.

Our carriers are aware of the budget realities being faced by federal agencies and Congress. However, even in the face of these challenges the system cannot afford to compromise safety for this smaller segment of the traveling public. Doing so would send a troubling signal that the lives of people in smaller communities do not hold the same value as those flying from major metropolitan airports.

Thank you for your consideration of our views concerning this important issue. We stand ready to work with you and your staff in any way possible to help resolve this troubling situation.

Sincerely,

A handwritten signature in cursive script that reads "A. Oakley Brooks".

A. Oakley Brooks  
President