

DEPT. OF TRANSPORTATION
DOCKETS

2005 OCT 28 P 2: 23

6519 Summerton Way
Springfield, VA 22150
21 Oct 05Docket Management Facility
US Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590-0001

FAA-2004-17005-13800

Reference Docket FAA-2003-17005, Notice 05-07

I am writing concerning the Notice of Proposed Rulemaking (NPRM) with regards to the Washington, DC, Metropolitan Area Special Flight Rules Area as at the referenced Docket Number. The NPRM proposes making permanent the temporary flight restrictions imposed around and in the vicinity of the Washington Class B airspace and furthermore proposes assigning criminal penalties for any violation of the proposed permanent airspace. I am opposed to both proposals as outlined below.

I feel I am qualified to knowledgeably address the issues raised in the NPRM as I am a private pilot who flies regularly in the Washington airspace. I am also an aircraft owner and base my aircraft within the Washington Air Defense Identification Zone (ADIZ) at Manassas, VA. I fly for pleasure and volunteer my services to the Civil Air Patrol, performing "Missions for America". Issues described below I have either experienced myself or heard over the airwaves while flying.

The Washington ADIZ is operationally unworkable and impractical. And now it is proposed to take something that does not function and make it a permanent entity. During World War II, there were air restrictions on much of the country, to include the vicinity of coast lines, and rightly so. When the threat passed, these temporary restrictions were removed. So should it be with our current security efforts – when the threat passes, remove the restrictions, although the Washington ADIZ needs reconfiguration and redefinition immediately. Making a permanent restriction for a transitory condition is not appropriate. This proposal is one more step towards making America the land of the naive and home of the afraid for once a right is removed or diminished, the government never returns it to the people, Temporary solutions for temporary issues is appropriate, and nothing more. The temporary solution is in need of attention though.

The Washington ADIZ was slapped together after near-knee jerk reaction from political pressure to be seen as doing something. Airspace control was effectively wrestled from the FAA by the Secret Service, de facto placing an agency with no aviation expertise in charge of complex airspace, made even more complex by its actions. That is what has made the ADIZ operationally unworkable as the simple solution was taken to essentially mirror the Washington ADIZ with its Class B with an unexplainable southern extension. Airspace designed for traffic control and aircraft movement purposes was pressed into service as a restrictive element and forced to do something for which it was not designed. Although I still question the need for the

larger ADIZ, believing the smaller FRZ to be more appropriate, an at present temporary ADIZ is in effect. If the ADIZ remains in effect, even temporarily, it needs to be redesigned and properly charted so that it suits traffic flow and is more in line with prominent geographical land marks rather than an arbitrary line in space as is now. Pilots can more easily navigate and there would be a reduction in the dreaded and rather dubious incursions. The overall footprint of the ADIZ needs to be reduced as the effects of it are felt on the Eastern Shore of Maryland to the Shenandoah Valley in Virginia, large chunks of airspace that do little for security and force unworkable and potentially dangerous situations on pilots (such as having to climb sufficiently high to be seen on radar when within 8 miles of a destination airport and having the destination airport in sight the whole time but being unable to climb legally or safely due to low cloud cover). Additionally, more airspace cutouts for airspace near the ADIZ boundary should be created so as to reduce the need for aircraft to participate in the system, thereby reducing controller work load and enhancing safety while still maintaining the Secret Service's desire for a security perimeter. Look to Freeway Airport as an example of how a cutout works with respect to current FRZ operation. I hesitate to call for creation of designated ingress/egress routes as that concentrates traffic in one particular area, making for decreased safety. (At Manassas for example, presently all east bound departures must depart to the west, primarily for radar identification purposes and to be headed away from the ADIZ as a fail-safe method. When about half way out of the ADIZ to the west, one is occasionally allowed to return east bound, other times not. Not only does this place all traffic from an airport going into the same geographical fix (Casenova VOR), but it also requires flights departing to Ocean City, MD, for example to, first fly towards Front Royal, then Charlottesville, then Fredricksburg, and then somewhat on course). Its akin of driving to Richmond while passing through Winchester!

Flight plans are required for flight in the ADIZ. Leesburg Flight Service Station (FSS) can not handle the volume of calls, and it is not unusual to wait 30 minutes to file a 40 second flight plan. The wait can be up to 6 times as long as the proposed flight in some instances, such as Potomac Airport to Maryland Airport, which involves both the FRZ and ADIZ. The rest of the country is allowed to use the DUATS system for flight plan filing, but ADIZ operations are not. Concept is that FSS personnel would be able to apprise pilots of potential ADIZ changes. Not once since this inception has FSS been able to provide such, so a valuable service such as DUATS goes unused while we overwork personnel and frustrate pilots. Additionally, government agencies do not talk or coordinate with each other very well with respect to flight plans. On the Potomac-Maryland flight described above, a roughly 5 minute flight, it takes six (6) phone calls to coordinate operations prior to departure – FSS to file the flight plan, Potomac Approach Control for the discrete beacon code, and National Capital Region Control Center to pass the same information that FSS was provided and Approach Control has provided. In this day of computer technology and database sharing, such action is archaic and representative of the ADIZ dysfunctionality.

To operate within the ADIZ, a discrete beacon code on the transponder is required. The FAA radar does not work well as there are many operational holes in its coverage and its accuracy in some areas is plus/minus three (3) miles. In the vicinity of Brooke VOR or at Warrenton, traffic must be at at least 2500' in order to be seen on radar, but yet can not be that high for long due to overlying airspace restrictions. This makes for a tight window in which to work for identification purposes, which are not always effective. Approximately 2 months ago, there was a failure of radar/radio coverage for the Brooke VOR area and up to a dozen aircraft were circling the reporting point for radar and radio acknowledgement. I was fortunate enough to be heard and seen so I was admitted while others waiting for an hour finally returned to their starting point, uncertain about how they would be getting home. Gaps in radar coverage, not allowing aircraft airspace access, coupled with radar accuracy, is what we are basing the ADIZ

upon. No wonder there are so many alleged incursions – many of them are not ADIZ incursions, just radar and system inaccuracies. Interestingly, military radar in the area seems to work fine. How come there is not a resource share? And the proposal is to base criminal penalties on a system that is broken! Another example of dysfunctionality.

A simple human error leads to great expense and pain for pilots. One person was served with a letter from the FAA stating he had violated the ADIZ, and he would need to take certain actions and face penalties. He lived on the West coast and was in the hospital, under going surgery at the time of the alleged incursion. The FAA transposed the aircraft tail number, but the pilot was considered guilty until proven innocent and spent a large sum of money defending himself against such a “bogus bust.” My experience shows this to be more the rule than the exception. And with the implementation of criminal penalties as proposed, individuals would face felony charges and jail time for simple errors! Next jaywalking will be a felony as an individual ventured from appropriate ground space without authorization. The parallels are the same.

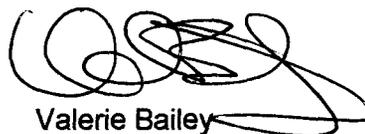
I base my aircraft in the ADIZ, but I do not frequent business I used to use any longer as either I can not get there or getting there has become virtually impossible. I no longer obtain fuel services at Maryland Airport, and I no longer obtain mechanical and avionics work at College Park Airport (the world’s oldest, continuing operational civilian airport) as while the airport is marginally “open”, the businesses have gone out of business. The AFROTC cadets from the University of Maryland used to receive Air Force-sponsored flight orientation from College Park Airport, but not any longer as operations were closed at College Park and now operational requirements are so draconian as to be prohibitive. Guess our future military leaders are learning to live in fear as a result.

One of the stated reasons for the ADIZ is for protection of the National Capital Area, and one reason the ADIZ is so large is so that there is reaction and response time. Physical response is left to the Bureau of Immigration and Customs Enforcement (ICE) with the aircraft based at Washington National Airport and the ANG’s 113 FW at Andrews AFB. Basing ICE at National Airport alone does not make sense given the distance the facility is to where the ADIZ begins. Centralization may be efficient for management but it is operationally defective. Dispersed ICE basing would allow for intercepts further away from DC and allow them to occur quicker if necessary at all considering the dysfunctionality described above. Why aren’t ICE assets based at Davison, Manassas, Leesburg, Gaithersburg, College Park, Andrews, and Hyde Fields, or some subset thereof? I am sure there are reasons, but I question them. Operating a central response point is like having one fire station for all of DC or Fairfax County. More efficient to have them all in one station – never mind the 40 minutes it takes to get to a fire. Same concept here. Protection of the National Capital Area is important, but that can be and has been achieved with the FRZ, the laser warning system, and the ICE system mentioned above, although malpositioned presently. No general aviation aircraft has ever been use in a terrorist attack. The likelihood of that happening is very remote simply because the average aircraft is incapable of causing desired damage. The Volkswagen Beetle can pack more destructive power than my aircraft yet I can drive a Beetle to or the vicinity of most critical government entities in DC, but yet I can not fly my aircraft from 15-60 miles of the same facility without being smothered in encumbrances.

The ADIZ does not need to exist – certainly as a permanent entity. The FRZ should remain in place as envisioned. While continuing to live with the ADIZ, it needs redesign and it needs new operational rules with respect to flight plans, beacon codes, and methods of communication. These issues need to be addressed now, and when the ADIZ has outlived its

usefulness, it needs to be rendered obsolescent like the WW II restrictions were. The current system is dysfunctional, and to base criminal penalties for system violation on such a system is a crime in and of itself.

Bottom line: the ADIZ needs to remain temporary in nature, it needs to be operationally and dimensionally redesigned, and no criminal penalties should be associated with it.



Valerie Bailey

CC: Senator John Warner
Senator George Allen
Congressman James Moran

Thomas Q. Brame, Jr.

ATTORNEY AND COUNSELOR AT LAW
Post Office Box 301
Bay Springs, Mississippi 39422-0301

Brame Building
2781 Highway 15
E-mail: tqbrame@bramelaw.com

Phone: 601-764-4355
601-764-4356
Fax: 601-764-4356

October 18, 2005

Fail Aviation Administration
400 7th Street Southwest
Nassif Building, Room PL-401
Washington, DC 20590-0001

Re: Official Docket Number FFA2004-17005, Proposed Washington DC Air Defense Identification Zone

Dear Sirs:

I have been a private pilot for over twenty-five years, and have for most of those years held an instrument rating and multi-engine rating. I have also for many years owned air craft which I fly in connection with my law practice, and for personal use. Typically I fly some one hundred hours per year all over our country, including but not limited to occasional trips into the greater Washington, D.C. area.

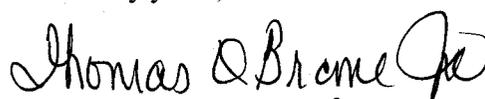
The Washington D.C. Air Defense Initiation Zone ("ADIZ") is operationally unworkable and imposes major burdens on pilots and air traffic controllers alike, with minimal security benefits, and must not be made permanent. I note that no general aviation aircraft has ever been used in a terrorist attack, and the government itself has determined that not a single ADIZ violation was terrorist related. While protecting the Washington D.C. area is of course a most worthy goal, this can be achieved with existing requirements under the Fifteen Mile Restricted Zone, but lighter private aircraft flying at slower speeds should not be subject to the ADIZ requirements for filing a flight plan, obtaining a unique transponder code and maintaining two-way communications with air traffic control. This serves no legitimate purpose. Accordingly, the proposed rule is flawed.

The purposed rule is further flawed because the evaluation of both the economic and operational impacts, on both pilots and aviation businesses, and the government analysis of alternatives to this rule, are all inadequate.

Please kindly consider my concerns as a private pilot, and I hope you will consider opposing this proposed rule.

Please contact me if I can provide any additional information, or if I can otherwise assist you in any of your other important endeavors on our nations behalf.

Sincerely yours,


Thomas Q. Brame, Jr. *rls*

TQB:rls
pc: AOPA
421 Aviation Way
Fredrick, Maryland 21701

October 19, 2005

Docket FAA-2004-17005
Docket Management Facility
U. S Department of Transportation
400 Seventh Street SW
Nassif Building
Room PL-401
Washington, DC 20590-0001

Docket – FAA – 2004 – 17005

Subject: Washington DC Metropolitan area
Special Flight Rules Area

Notice Proposed Rule Making in the Federal Register – Docket 17005 announcing the plan to make the Washington DC ADIZ a permanent Special Flight Rules area.

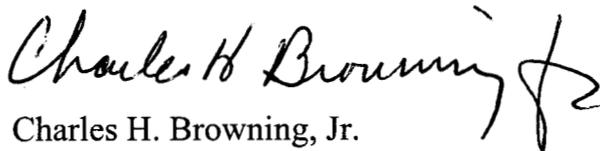
Comments

1. As a pilot permanently based in the ADIZ at a private airport without direct radio communication on the ground with the controlling approach sector this requires phone contact each time I seek to leave the airport. Delays in reaching control approach often exceed ½ hour due to the controller workload and phone access being busy, re-entering can be delayed as well due to over load on controllers.
2. Private aviation businesses within the ADIZ airports are no longer attractive destination due to the restricted access caused by the ADIZ requirements. Many of them are no longer in business due to this drastic reduction in their clients willing to risk the procedures necessary to Fly into the affected airports. This loss of infrastructure to general aviation in a large Metro area served by private and business aviation is similar to loosing any other major system of transportation in this country. Should this concept be accepted and allowed to multiply to other major metro areas the impact will be catastrophic to the aviation industry far more than 911. The enemies of this country will be witness to a self inflicted injury to the nations transportation system far greater then anything they could do on their own.
3. This concept was hastily instituted as a temporary measure and not a permanent answer to security. The concept itself disrupts huge amounts of air space and needless violations, which in no way threaten the security of the Nations capital. The original 15-mile circle seemed appropriated and far more workable. Even emergency service and local police find it

difficult to provide service without threat of intervention due to equipment or communication malfunctions.

4. Seeking assistance from the pilot community as represented by AOPA and EAA for input to reduce the impact on the nations private and business aviation system with the needs of the nations security is a prudent way to improve safety for all.
5. The excessive areas of airspace restricted only make it more difficult for the pilot to travel north and south thru the area and block potential safe passage in times of bad weather!! The job of monitoring and policing the areas greatly increase with the size restricted. Should this concept be encouraged in other larger Metro areas the burden becomes multiplied and unsustainable, not to mention the devastation to the aviation community.
6. Penalties – Most violations are not with the intent of any threat to the nation. The potential threat of being shot down in the most severe violations is retribution enough. Multiple violations or gross disregard for the nations security such as over flying the seat of government may deserve appropriate legal penalty based on facts revealed in a legal proceeding with legal representation for a defendant.
7. Repeat: Don't put in place something that destroys the aviation infrastructure of the Nation and becomes unsustainable when the ill considered concept spreads to other metro areas when their elected officials believe their security needs warrant such drastic measures.

Sincerely



Charles H. Browning, Jr.
AOPA Member 00403883-1970
EAA Member 9025472
1874 Rt. 94
Woodbine, MD 21797
410-489-4126

cc: The Honorable Paul S. Sarbanes
The Honorable Barbara A. Mikulski
The Honorable Elijah E. Cummings
AOPA

Henry C. Chinski
32 Ponderosa Dr.
Middletown, DE 19709

Docket Management Facility
U.S. Dept. of Transportation
400 Seventh Street, SouthwesNassif Building, RoomPI-401
Washington, D.C. 20590

Dear Sir's

I object to making temporary Washington, D.C.-area flight restrictions Permanent. The restricted area would be called "national defense airspace", replacing current Air Defense Identification Zone (ADIZ). The 15 nautical mile radius no-fly zone (FRZ) protects the national assets in nation's capital. FAA proposal lays out statutory authority to punish violators. Numerous upgrades to security systems around the nation's capital including VWS, anti-aircraft missile batteries, and greatly improved radar coverage significantly enhance protection offered by the FRZ, making ADIZ UNNECESSARY. Smaller, slower general aviation aircraft do not pose significant threat because they have neither mass or cargo capacity to cause large-scale damage. The bigger threat you have would be from Washington National, BWI, and possibly Dullas International with their heavy jet airliner traffic.

The ATC is overloaded and as such is creating an unnecessary hazard of its own, If you doubt what I am saying go talk to ATC you may be enlightened

Thank You



Henry C. Chinski

Thomas Coakley
10617 North 8th Street
Phoenix, AZ 85020
(602) 944-1922
c462c@aol.com

October 18, 2005

Docket FAA 2004-17005
Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590-0001

Dear Sir or Madam:

I am private pilot with 500 hours of flight time. I fly about 100 hours annually in my homebuilt RV-8 aircraft for personal transportation and occasional business use.

The proposal to make the Washington, DC area ADIZ permanent would be very restrictive. I currently fly out of Glendale, AZ which is in the veil of the class B airspace of Phoenix, AZ. After September 11, 2001, a similar restriction was put in place for about six weeks in the Phoenix area. During this time, I was unable to fly my aircraft at all. It was an economic hardship because I was paying for an aircraft and hangar that I was unable to utilize.

Particularly severe were the restrictions put on the flight schools at my airport. They were virtually grounded during this time, causing some flight schools to shut down. The Phoenix area is one of the largest flight training areas in the country, with over ten flight schools training pilots who will go on to fly in the military and airlines.

The Washington, DC Air Defense Identification Zone is operationally unworkable and imposes major burdens on pilots and air traffic controllers alike, all with minimal security benefits and it is imperative that the ADIZ not be made permanent.

No general aviation has ever been used in a terrorist attack. And the government has determined that not a single ADIZ violation was terrorist-related.

Protecting the Washington, DC area can be achieved with the existing requirements for the 15-mile Flight Restricted Zone (FRZ), but lighter aircraft, flying at slower speeds, should not be subject to the current ADIZ requirements for filing a flight plan, obtaining a unique transponder code and maintaining two-way communication with air traffic control.

The proposed rule is flawed because the evaluation of the economic and operational impacts on pilots and aviation businesses and an analysis of alternatives are insufficient.

Sincerely,

A handwritten signature in black ink that reads "Tom S. Coakley". The signature is written in a cursive, slightly slanted style.

Thomas S. Coakley

cc: Aircraft Owners and Pilots Association

233 Vine Street
Philadelphia, Pa. 19106
October 20, 2005

Federal Aviation Administration
Docket FAA-2004-17005
Docket Management Facility
US Dept. of Transportation
Nassif Building, Rm. PL-401
400 Seventh St., SW
Washington, DC 20590

I am a private pilot with more than 750 hours and an instrument rating. I am co-owner, with 19 other pilots in a club, of a Piper Archer and a Piper Lance based at Northeast Philadelphia Airport. I fly mostly for weekend trips.

The proposal to make permanent the Washington, DC ADIZ is ill conceived and pointless. Instead of making the skies safer, it makes them more dangerous. These rules make flying more difficult for pilots -- especially those flying single-pilot -- and will overburden our already taxed air traffic control system even further.

Does this proposal make our nation's capital more secure? No. Remember, NO GENERAL AVIATION AIRCRAFT HAS EVER BEEN USED IN A TERRORIST ATTACK. So why are we trying to place the strictest rules on this class of operators? A small plane has approximately the same weight and destructive potential as your average compact car -- not a truck, not an SUV, not even a minivan. A car. A small car.

These restrictions on tiny airplanes around the Washington, DC area can have an enormous impact on a recreational flier. A clogged air traffic control system sometimes adds one hour onto a one-hour flight, effectively doubling the duration of a flight and the cost of the trip.

The Smithsonian has a beautiful new aviation display -- the Udvar-Hazy museum. It's a strong attraction for anyone involved in aviation, and it would be an ideal fly-in location for weekend pilots. Yet many pilots would be restricted from flying into Dulles airport because of these onerous and pointless restrictions!

I hope the FAA will work with the Aircraft Pilots and Owners Association to develop more reasonable and useful rules to protect the airspace around Washington, DC. The current proposal should be scrapped.

Thank you very much for your attention.

Very truly yours,



Edward Fischer

cc. Aircraft Owners and Pilots Association

John S. Grim
3116 Joe Wheeler Drive
Wilmington, NC 28409-6900
Phone (910) 397-2721 / Fax (910) 397-9525
E-Mail Dgrim69960@aol.com

21 October 2005

Docket Management Facility
US Department of Transportation
400 Seventh Street SW
Nassif Building Room PL-401
Washington, DC 20590-0001

RE: Docket FAA-2004-17005

Dear FAA:

I own a single engine aircraft, am a private pilot/instrument rating with 1,000 hours and fly 100+/- hours per year for both business and pleasure. Trips often take me to central PA from NC so the current Washington DC ADIZ is in play for me. My opinion is that the ADIZ is an operational disaster for pilots and controllers. I've heard on frequency on more than one occasion around and in the ADIZ the confusion between pilots and controllers and the time wasting that resulted compromised the safety and flow of other aircraft in that controller's sector. I believe this ADIZ provides minimal or no security benefits. General Aviation airplanes have never been the problem and no past error has ever been by a terrorist---only by patriotic, taxpaying citizens. In addition, GA aircraft do not possess any punch. Flies don't hurt lions---only other lions do!

It would be smart business for the FAA and Homeland Security to take the resources they would be wasting on keeping this DC ADIZ and using them to protect our borders. Getting more bang for your buck (our buck) is good isn't it?

NO ADIZ!!!

John S. Grim

726 Lennox St.
Midvale, UT 84047
October 18, 2005

U.S. Department of Transportation
400 Seventh Street SW
Nassif Building, Rm PL-401
Washington, DC 20590-0001

Gentlemen:

This is my public comment on FAA-2004-17005.

The Washington, DC ADIZ was hastily conceived and remains sure way to destroy general aviation in several eastern states. There never was a real threat to anything inside the these hundreds of cubic miles of grabbed air space posed by small general aviation airplanes. No general aviation planes have ever been used to attack any targets within the Washington, DC ADIZ. There has been a lot of false alarms and people on the ground and in offices inconvenienced by the false alarms since 2001. The further extension of the ADIZ, is now getting even more extreme in my opinion. The proposal is a great BIG folly to make the Class B Security Airspace PERMANENT.

Speaking as a private pilot who has been flying since 1969 (which was before any Class B airspace), this whole concept of ground-based air traffic control is being made obsolete by today's technology. With all the information available on multifunction displays in small airplanes, it is getting more and more clear that ground based air traffic control for safety and separation can be done by every plane with the proper equipment. General aviation aircraft are just stopped from normal peaceful operations by bureaucratic airspace decisions without realism of threats being the guiding principle. That is why this proposal is folly.

This proposed rule is an expansion of unreal unneeded restrictions causing economic devastation to aviation business. There has been no real weight given to alternatives which would allow VFR flights in Virginia, Maryland and Washington, DC. Expansion of this concept, will put excessive burden on air traffic controllers and on pilots and passengers in small planes. No permanent airspace change should be done. This change would not provide more than minimal security benefits.

There you have my assessment of the NPRM 2004-17005.

Ready to do more,



Frederick G. Kluss
Cert. No. 1970129

CC: J. Matheson
R. Bennett

October 19, 2005

Lawrence A Millonzi
9509 Verneda Ct.
Las Vegas, NV 89147

Subject: Washington, DC area ADIZ. Docket Number: FAA-2004-17005

I am a pilot with a Commercial license and a current medical. I have not flown since 9/11 because of the fear of purchasing \$1000 worth of insurance and then being grounded as was the case immediately after 9/11. Although that grounding was temporary and relatively short, my feeling, at that time, was that another aviation terror incident could produce worse consequences.

I am ready to begin flying again but am now concerned about the policy changes in regard to allowing the Washington, DC area ADIZ to be made permanent-**Docket Number: FAA-2004-17005**. If this ruling can be passed for the Washington, DC area, it can set a precedent for the same ruling in other areas. This would be a grave hindrance to pilots flying under VFR.

It should be obvious that general aviation aircraft are not capable of providing the energy or load capacity necessary to inflict substantial damage to any target of importance. Lighter general aviation aircraft (Cessna 172 etc...) are even less capable.

The economic impact of strangling the general aviation business with unnecessary regulations should also be evaluated. As in my case, I have concerns about flying again, and there could be many more pilots with the same concerns.

I would appreciate your thoughtful and sincere evaluation of the Washington, DC area ADIZ proposal, and hopefully my concerns will help you in your decision. I respectfully hope that your decision is to **NOT** make the ADIZ permanent.

Lawrence Millonzi

A handwritten signature in cursive script that reads "Lawrence Millonzi". The signature is written in black ink and is positioned below the printed name.

Sherry Parshley
10617 North 8th Street
Phoenix, AZ 85020
(602) 944-1922
c462c@aol.com

October 18, 2005

Docket FAA 2004-17005
Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590-0001

Dear Sir or Madam:

I am commercial pilot and certified flight instructor, with 1700 hours of flight time. I fly about 100 hours annually in my homebuilt RV-8 aircraft for personal transportation and occasional business use.

The proposal to make the Washington, DC area ADIZ permanent would be very restrictive. I currently fly out of Glendale, AZ which is in the veil of the class B airspace of Phoenix, AZ. After September 11, 2001, a similar restriction was put in place for about six weeks in the Phoenix area. During this time, I was unable to fly my aircraft at all. It was an economic hardship because I was paying for an aircraft and hangar that I was unable to utilize.

Particularly severe were the restrictions put on the flight schools at my airport. They were virtually grounded during this time, causing some flight schools to shut down. The Phoenix area is one of the largest flight training areas in the country, with over ten flight schools training pilots who will go on to fly in the military and airlines.

The Washington, DC Air Defense Identification Zone is operationally unworkable and imposes major burdens on pilots and air traffic controllers alike, all with minimal security benefits and it is imperative that the ADIZ not be made permanent.

No general aviation has ever been used in a terrorist attack. And the government has determined that not a single ADIZ violation was terrorist-related.

Protecting the Washington, DC area can be achieved with the existing requirements for the 15-mile Flight Restricted Zone (FRZ), but lighter aircraft, flying at slower speeds, should not be subject to the current ADIZ requirements for filing a flight

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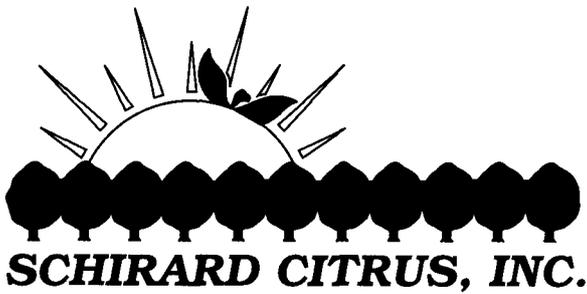
The proposed rule is flawed because the evaluation of the economic and operational impacts on pilots and aviation businesses and an analysis of alternatives are insufficient.

Sincerely,

A handwritten signature in cursive script that reads "Sherry J. Parshley".

Sherry J. Parshley

cc: Aircraft Owners and Pilots Association



P.O. BOX 2667 • FORT PIERCE, FL 34954
(772) 466-0112 • FAX (772) 466-2850

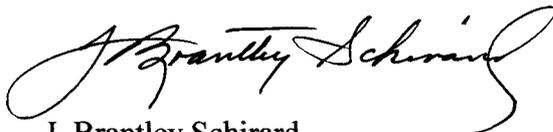
October 20, 2005

Docket FAA-2004-17005
Docket Management Facility
US Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590-0001

Docket Number 17005

I am responding to the FAA Docket #-FAA-2004-17005. This ADIZ proposal to become permanent is common sense unworkable and imposes continued flawed burdens on pilots and the traffic control system. This rule or others similar under any pretense of consideration should not be made permanent.

I am a GA pilot, instrument rated, with over 7000+ hours since 1963, aircraft owner used for both business and personal transportation. To anyone's knowledge no GA aircraft has ever been used in any terrorist – related event. To attempt to over regulate protectionism into our now current, successful operating restrictive air space, will not prohibit this possibility of a violation while imposing operational unworkable issues and already economic hardship not affordable to pilots or the systems.



J. Brantley Schirard