

Based Aircraft Registration Program Evaluation

Thank you for the opportunity to evaluate the proposed Aircraft Registration Program. The program seeks to record the number and type of aircraft based at airports in the state for planning purposes, and to comply with the FAA Airport Improvement Program (AIP) requirement to report based aircraft for airports included in the National Plan of Integrated Airports System (NPIAS).

While it may be desirable to acquire new information for airport system planning, currently with tight budgets and concerns about maintaining essential services, we believe it is important to focus on the specific requirement that DOT is obligated to meet, as a grant assurance under the FAA Airport Improvement Program. The requirement is to report based aircraft for the subset of airports owned by the state that are listed in the NPIAS. We believe there is a more cost effective way to comply with this requirement, and a better method to obtain data about the activity of rural airports--without negatively impacting aircraft owners, 90% of whom are not based at airports subject to this requirement.

Reporting Requirement

The FAA Airport Master Record database lists a total of 749 airports in Alaska. Illustrated in Chart 1, almost half of those are Private Use airports, and just under 20% are Public Use non-NPIAS airports. Of those, only 259, or 35% are included in the NPIAS.

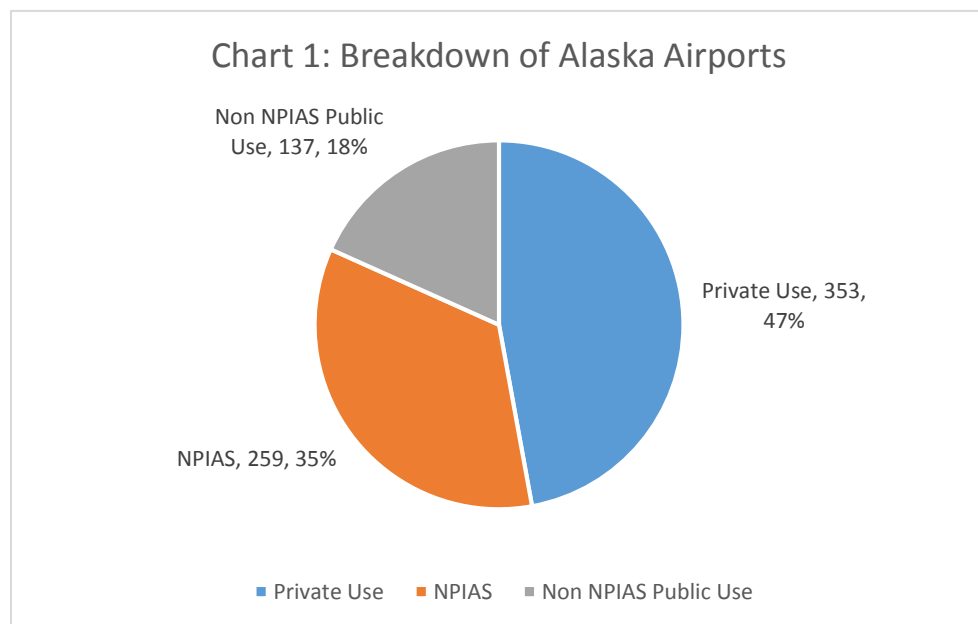
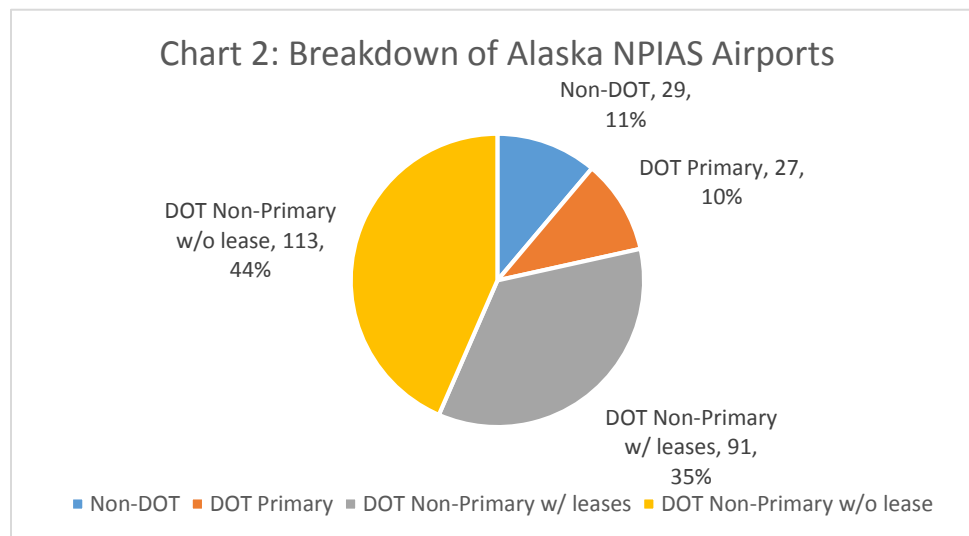


Chart 2 is a breakout of the NPIAS airports. Of these, twenty-nine are owned by cities, boroughs, or private entities, and are not the responsibility of DOT. Of the airports owned by the department, twenty-seven are classified as Primary airports. According to FAA Airports, and instructions on the National Based Aircraft Program (basedaircraft.com), airports classified as Primary do not have to report based aircraft under this program.



Of the remaining 204 DOT airports that are required to report based aircraft, ninety-one have leasing programs. A letter sent to the leaseholders asking them to report any based aircraft associated with their lease should produce the

required information for those airports. Eight of those airports also have tiedown programs, which means the department should already have data covering aircraft based at those locations, not associated with leaseholds.

This leaves 113 airports that do not have leasing programs, or a tie-down program. These airports include unattended airports, seaplane bases and a helipad scattered across the state. A search of the current NPIAS figures for aircraft reportedly based at those airports shows a total count of 40, with over half of those being as a single airport (Naknek). Since the DOT already manages the airport inspection program for FAA, which visits all public use airports on a three-year cycle, it should be possible to have those inspectors note anything that appears to be a based aircraft.

Having the department generate a letter to leaseholders and adding an element to an existing airport inspection program, already paid for by FAA, should produce the required data. This also avoids inconveniencing the estimated 5,000 aircraft owners who do not keep their aircraft at a DOT owned airport.

Airport System Planning Information

With regard to the stated program purpose of collecting information for airport system planning, we question the value of based aircraft. While this parameter is used as a basis for funding in many places in the country, it is well understood that many of the airports that are critical to Alaska are the General Aviation and Commercial Service category airports serving rural communities which typically have zero based aircraft. A far better measure of activity would be for the department to deploy the acoustic traffic counter it already owns to collect airport traffic counts. This is a well-established method of measuring airport use which could help address airport planning issues in these times of tight resources.

Impact on the aviation community

The proposed program, requiring participation by all aircraft owners in the state, to collect information about the aircraft that reside at only 27% of the airports in the state (those required to report based aircraft to FAA) has an impact on the aircraft owners.

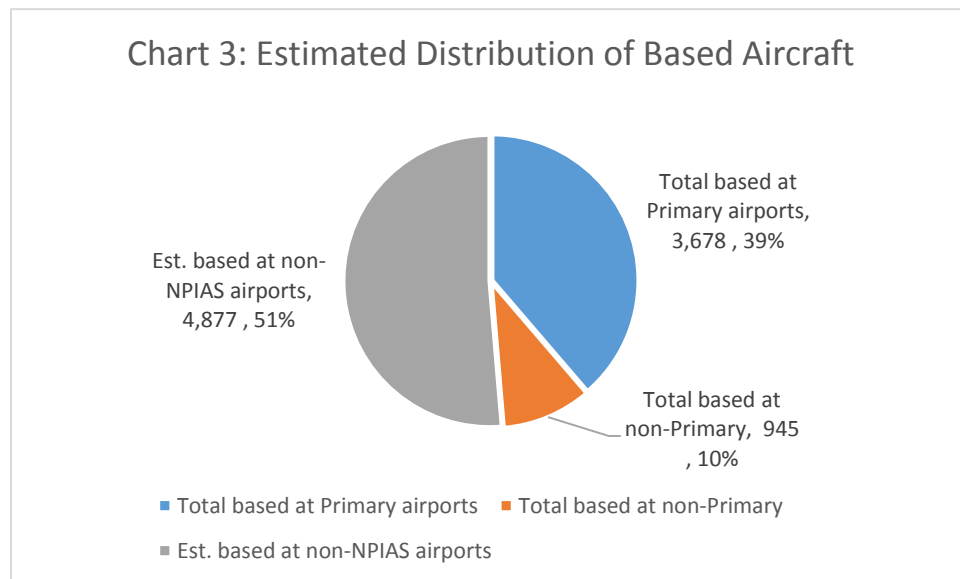


Chart 3 shows the approximate distribution of aircraft based at the different types of airports in Alaska. Using DOT's estimate of 9,500 aircraft in the state, and the NPIAS figures for those airports that do report, just over half of the aircraft are located at airports not required included in the NPIAS. Another

40% are located at Primary airports, also not required to report to FAA. This leaves just 10% of the aircraft at airports that would be benefiting from this program, yet putting a burden to register on the 90% of aircraft at locations not required to report. This seems like an inefficient way to collect the required information that inconveniences over 8,000 aircraft owners, to collect information for less than 1,000 aircraft.

Recommendation

As a result of this analysis, we recommend the aircraft registration program not be implemented, and that DOT utilize the leasing records and 5010 Program to more efficiently collect the information needed to comply with FAA's airport sponsor obligations.

Adopted by the Aviation Advisory Board on September 30, 2016