

AERONAUTICAL CHARTING MEETING
Charting Group
Meeting – April 27 - 29, 2021

RECOMMENDATION DOCUMENT

FAA Control #21-01-360

Subject: Correcting notations on VFR sectional charts regarding effective hours of surface-level controlled airspace at eleven airports with part-time control towers.

Recommendations:

Change the notation on the VFR sectional charts for the eleven airports GCK, JEF, NHK, CXY, UNV, NTU, MKG, RST, GFK, RAP, and PRC from "See Chart Supplement for D/E(surf) eff hrs" to "See Chart Supplement for D eff hrs", to reflect the fact that the none of the surface-level Class E airspace at these airports vanishes (converts to Class G airspace) when the control tower is closed.

Background/Discussion:

Consider the case of an airport with a part-time control tower, with Class D airspace and a surface-level Class E (E4) "extension".

Section 3-2-6 e 2 in the Airman's Information Manual (2021 edition) reads as follows:

"Surface area arrival extensions become part of the surface area and are in effect during the same times as the surface area... When a part-time surface area changes to Class E airspace, the Class E arrival extensions will remain in effect as Class E airspace. If a part-time Class C, Class D, or Class E surface area becomes Class G airspace, the arrival extensions will change to Class G at the same time."

This passage tells us that in the case of an airport with a part-time control tower, with part-time Class D airspace and a surface-level Class E (E4) "extension", when the control tower is closed, the entire surface-level controlled airspace will either convert to surface-level Class E airspace, or will vanish (convert to Class G airspace). We'll never see the surface-level Class E (E4) "extension" vanish while the Class D airspace converts to surface-level Class E airspace, and we'll never see the Class D airspace vanish while the "extension" remains as surface-level Class E airspace.

So in the case of such an airport, when the tower closes, we only have two possibilities. Either the entire airspace (including the E4 "extension") becomes surface-level Class E airspace, or the entire airspace including the E4 "extension" vanishes (becomes Class G airspace).

On the VFR sectional charts, it appears that the intention of the designers of the charting conventions was to use the "See Chart Supplement for D eff hrs" for all the cases where the

surface-level controlled airspace converts to surface-level Class E airspace when the tower is closed, while reserving the "See Chart Supplement for D/E(surf) eff hrs" notation for all the cases where all the surface-level controlled airspace vanishes (converts to Class G airspace) when the tower is closed. This would allow pilots to know which of these two possibilities exists at any given airport just by looking at the VFR sectional chart. It only would be necessary for a pilot to consult the Chart Supplement or other resources if he or she wished to know the actual timetable for the effective hours of the Class D airspace.

However, this apparent intention is currently not implemented correctly. The "See Chart Supplement for D/E(surf) eff hrs" is currently used for some airports where the Chart Supplement tells us that the surface-level controlled airspace converts to Class E airspace when the tower is closed, as well as for all airports where the Chart Supplement tells us that the all the surface-level controlled airspace converts to Class G airspace when the tower is closed.

Therefore any pilot encountering the "See Chart Supplement for D/E(surf) eff hrs" label on any VFR sectional chart is forced to check the "Chart Supplement" or other resources to understand the status of the surface-level airspace when the tower is closed. This is not ideal.

My suggestion is to fix this problem, and increase standardization, by changing the label on the VFR sectional charts for the eleven airports GCK, JEF, NHK, CXY, UNV, NTU, MKG, RST, GFK, RAP, and PRC from "See Chart Supplement for D/E(surf) eff hrs" to "See Chart Supplement for D eff hrs", to reflect the fact that none of the surface-level Class E airspace at these airports vanishes (converts to Class G airspace) when the control tower is closed. If this suggestion were implemented, a pilot encountering the "See Chart Supplement for D/E(surf) eff hrs" on any VFR sectional chart could be confident that all the surface-level controlled airspace at that airport converted to Class G airspace when the tower was closed, and would only need to consult the Chart Supplement if he or she wished to know the actual time schedule of when the control tower was open and when the control tower was closed.

It is understandable that charting personnel may have experienced some confusion about the status of the surface-level controlled airspace at these eleven airports during the hours that the control towers were closed. The "Airspace Designations and Reporting Points" document (FAAO 7400.11E) is very complex, and actually has four different ways of describing the status of surface-level controlled airspace at an airport with a part-time control tower, with part-time Class D airspace and a surface-level Class E (E4) "extension". Readers interested in exploring these four different styles of airspace description in more detail may wish to peruse Attachment B. However, it is not really necessary to thoroughly understand this additional supplemental material in order to understand the basis for this suggestion. The key point is simply that regardless of the details of the airspace descriptions in the "Airspace Descriptions and Reporting Points" document, the Chart Supplement makes it clear that at each of these eleven airports, all the surface-level controlled airspace becomes surface-level Class E airspace during the hours that the control tower is closed.

The exact language in the Chart Supplement regarding the status of the surface-level controlled airspace for each of the eleven airports that are the focus of this suggestion, as well as some other airports, is given in Attachment A.

Comments:

Submitted by: Steve Seibel

Organization: none (private citizen)

Phone: 316-201-8732

E-mail: sseibeloffice@gmail.com

Date: April 2, 2021

Please send completed form and any attachments to:
9-AMC-AVS-ACM-Info@faa.gov

MEETING 21-01

Steve Seibel presented the new recommendation. He proposed changing the notation on the VFR sectional charts regarding the effective hours of surface-level controlled airspace at eleven airports. He suggested that the note should read "See Chart Supplement for D eff hrs" rather than the current note of "See Chart Supplement for D/E(surf) eff hrs". He said this would more accurately reflect the fact that none of the surface-level Class E airspace at these airports converts to Class G airspace when the control tower is closed. He clarified that this recommendation only effects part time Class D airspace that have a surface level Class E extension. For more information regarding the background of this item, please see the Recommendation Document.

Katie Murphy, FAA/AJV-A214, said the Visual Charting Team has begun investigating these concerns and agrees that there are some charting inconsistencies. She said they plan to complete a full audit of these notes to make sure they are charting them correctly per specifications.

Paul Gallant, FAA/AJV-P210, said he always understood that the notes only refer to the core surface area and don't pertain to the extension areas. He said the Legend in the Chart Supplement has some explanation about the extension areas. He also said his office is in the process of working on rulemaking to clarify surface areas and extension areas and how they relate to each other. Paul provided some historical perspectives regarding this issue.

Rich said that he had introduced a related ACM recommendation in 2007 regarding the legal description discrepancies between airspace and extensions. Paul said he had thought the discrepancies had all been resolved, but issues continue to come up, particularly with regard to extension areas.

Katie says from the VFR charting perspective, we want pilots to look at the Chart Supplement and NOTAMs to figure out what they need to know about the airspace. Steve agreed, but emphasized that he would also like to make sure the notes are charted consistently.

Valerie Watson, FAA/AJV-A250, asked Paul if the rulemaking work he discussed will change airspace legal descriptions. Paul said they don't yet know what the final outcome will be. Valerie

then summarized that this item will remain open for the Visual Charting Team to take a closer look at this issue and the examples Steve provided.

STATUS: OPEN

ACTION: Katie Murphy, FAA/AJV-A214, will investigate VFR charting of airspace effective hour notations and report back at the next ACM.

MEETING 21-02

Samer Massarueh, FAA/AJV-A223, reviewed the issue. Katie Murphy, FAA/AJV-A214, reported that her team has evaluated every part-time airspace effective hour notation on the VFR charts. Katie said they found a number of charting inconsistencies and have made approximately 30 corrections. Steve Seibel, the proponent of this issue, said he is satisfied with the results. He then described one lingering issue with the legal description at Wilkes-Barre Scranton International Airport. Valerie Watson, FAA/AJV-A250, said the Airspace Rules division would first need to modify the legal description before the chart can be updated.

Paul Gallant, FAA/AJV-P210, said it does sound like there is an error and it should be looked at by the FAA Eastern Service Center. He said the Airspace Rules division is currently working on updating CFR Part 71 to address confusion regarding extensions and the relationship to surface areas. Paul said Steve can contact him directly about his specific concern.

All action are complete and there was agreement to close this issue.

STATUS: CLOSED