



U.S. Department
of Transportation
**Federal Aviation
Administration**

Great Lakes Region
2300 East Devon Avenue
Des Plaines, IL 60018

DEC 10 2015

Mr. Al Rapp
Ms. Cheryl Hansen
FAiR Leadership
500 Vine
Park Ridge, IL 60068

Dear Mr. Rapp and Ms. Hansen,

Thank you for your letter to me dated October 12, 2015, with questions regarding Optimized Profile Descent (OPD), Converging Runway Operations (CRO), and O'Hare International Airport operations.

In response to your "General" questions, we offer the following information:

1. OPD has, in fact, already been implemented in Chicago airspace where feasible, as part of the Chicago Airspace Project (CAP). CAP was a multi-phased airspace realignment project that FAA undertook, and completed in 2013, to optimize Chicago airspace to efficiently align with the reconfigured O'Hare airfield that the O'Hare Modernization Program (OMP) is creating. CAP was acknowledged and addressed in the O'Hare Modernization Environmental Impact Statement (EIS) that was completed in 2005.

It would be correct to acknowledge that, as the Federal Aviation Administration (FAA) proceeds with full implementation of the Next Generation Air Transportation System (NextGen), FAA may consider further application of OPD in Chicago-area airspace, where opportunities for added airspace efficiency gains present themselves. However, at this point in time, no further enhancements of this type are being considered by FAA, beyond the OPD and other NextGen airspace enhancements already implemented under CAP.

2. Regarding the discussion of altering the current nighttime Fly Quiet program, the FAA defers to the Chicago Department of Aviation (CDA) and the O'Hare Noise Compatibility Commission (ONCC), as leaders of that discussion, to determine what runway utilization options they wish to explore. FAA does play a role in that discussion, and we stand ready to serve as a technical resource as the discussion proceeds. It would be premature, and inappropriate, for FAA to restrict that discussion at this point in time, in terms of runways to be considered or not considered for nighttime use.

3. Before O'Hare operations transitioned to East Flow and West Flow in 2013 with the commissioning of Runway 10C/28C and the completion of CAP, many operating configurations at O'Hare impacted Midway operations. And conversely, there were also some operating configurations at Midway that restricted how O'Hare's runways could be used. Currently, when O'Hare Runway 14R is being used for arrivals and Runway 22L is being used for departures, arrival operations on Midway Runway 13C are restricted.

4. Rules regarding Converging Runway Operations (CRO) were imposed at O'Hare on April 15, 2014. Since that date, FAA has been operating O'Hare traffic in accordance with those rules. In order to meet the rule when it was imposed, the immediate solution was to operate without daytime departures from Runway 32L during West Flow operations and from Runway 4L during East Flow operations. As discussed in various public forums, including ONCC meetings, the FAA has since developed tools that allow for limited operations to occur on Runway 32L during West Flow.

5. The FAA does not utilize any operations that would pose a safety threat to airline passengers. FAA's safety perspective and governing rules are dynamic and, as we gain a more informed perspective on any aspect of safety, our agency adapts its rules and procedures to ensure the highest level of safety for the flying public at all times.

When FAA implements new safety procedures such as those driven by converging runway operations, however, there sometimes becomes a tradeoff between improved safety and efficiency of airfield operations. For this reason, and since safety is always FAA's highest priority, the FAA wholeheartedly supports the efforts of airport owners to establish airfield configurations that are as efficient as possible and avoid the introduction of safety-related constraints (such as converging runways). The modernization of O'Hare's airfield to a parallel runway configuration is an example of this.

In regard to your questions on the use of the "10R-28L Offset Approach", you are correct that this runway is currently being used predominantly in the East Flow configuration, during which, the new runway has provided a significant increase in airfield operational efficiency. The offset Instrument Landing System (ILS) approach to 10R directs aircraft to the runway on a final approach path that is 2.5 degrees offset to the south of extended runway centerline, and approaching aircraft using the offset approach intercept the extended runway centerline about 1.5 miles from the west end of the runway and, from that point, fly the runway centerline to the touchdown point on the runway.

You are also correct that the new runway is currently not often used in the West Flow configuration. Regarding establishment of an offset ILS approach to Runway 28L similar to the offset approach to 10R, the FAA is currently exploring the feasibility of establishing such an approach. Lastly, there is a straight-in approach to 28L in place, and further NextGen approach procedure options will be examined in the future.

Regarding your questions on "Taxiways", we offer the following:

1. The FAA controls ground traffic using all taxiways on the airfield, while the airlines control ground traffic in and out of gates and in proximity to the terminals.
2. The portion of Runway 14L/32R that is being used for taxi purposes is the portion that is south of Runway 9R/27L. Aircraft arriving on Runway 9R use that section of Runway 14L/32R to taxi towards the terminal core. Using the runway in this manner allows for more efficient use of Runway 9R for arrivals. All routes that are utilized for taxiing are selected because they provide the safest and most efficient taxi operations on the airfield when using various airfield operating configurations.

3. Regarding taxi times from any given runway to the terminals, taxi times vary based on a number of factors which include, but are not limited to, airfield construction, pavement condition, and time of day. The FAA does collect data on taxi times from various points on the airfield and under various airfield operating configurations. Our website, FAA Operations and Performance Data, located at: aspm.faa.gov, provides operational data and is available to the general public. From this website you can create reports that provide information on taxi times.

4. The FAA does not introduce new procedures into its operations without a thorough analysis of risk and ensuring appropriate degree of safety of operations is achieved. Our operations at O'Hare and throughout the National Airspace System (NAS) benefit from aggressive Safety Risk Management processes. Additionally, we hold monthly Runway Safety meeting with CDA and the O'Hare air carriers. Before any changes in pavement usage are implemented, the proposal is thoroughly analyzed and reviewed by FAA, CDA and the air carriers. The FAA has devoted substantial attention to designing taxi routes to minimize the possibility of runway incursions and, consequently, to provide the highest level of safety possible on the airfield.

5. Regarding taxi routing to Runway 4L under the specific configuration mentioned, taxi routing is determined by a number of varying factors on a day-to-day basis.

6. In regard to taxi routing to Runway 32R, please see our previous response on 4L.

Regarding your question on "Go Arounds", the Converging Runway Display Aid (CRDA) tool is intended to assist us in achieving the highest possible level of safety and operational efficiency when utilizing a converging runway scenario. Our operating procedures are designed so that safety is never compromised, and safe operations are maintained at all times. Regarding specific data on aborted take offs and missed approaches (go arounds), any party may obtain whatever information FAA has on that topic by filing a Freedom of Information Act request with our agency.

Regarding your questions on "Safety and Capacity of Current Configuration", we offer the following:

1. Category I capability is all that is needed at O'Hare the vast majority of the time. The "limitation" of using O'Hare's diagonal runways for arrivals is tied to the number of flights per hour that can be cleared for arrival when these diagonal runways are in use. During peak daytime hours when the highest concentration of flights are accessing the airport, configurations using the diagonal runways for arrivals cannot keep pace with demand, and system delays result.

2. The CRO rules allow for the safe use of converging runways. However, while safety is maintained at all times when we use converging runways, airfield efficiency (arrival/departure rate) is reduced under those configurations, and that reduction in efficiency cannot be sustained for any length of time in peak daytime hours at O'Hare without causing system delays.

3. Through 7. No combination of runways would be used if that configuration could not be utilized safely. In general, all of the configurations you raise can indeed be operated safely. However, the use of diagonal runways introduces interdependencies with the use of other runways, and airfield operating efficiency suffers as a result of those interdependencies. For this reason, the use of parallel east-west runways for arrivals and departures is much preferred from

both a safety and operational efficiency perspective. Our website, FAA Operations and Performance Data, located at: aspm.faa.gov, provides operational data and is available to the general public. From this website you can create reports that provide information on runway configuration and arrival and departure rates. If this data does not meet your needs, you may also file a Freedom of Information Act request with our agency.

8. Runway 14L/32R, before being closed earlier this year, was used approximately 1% of the time during the most recent recorded year of operations at O'Hare. Runway 32L is used more extensively for departures (as compared to 14R for arrivals), although not as much during daytime hours when demand is high, primarily because of CRO restrictions. While CRDA will help to optimize safety and efficiency when 32L is used for departures simultaneously with arrivals on Runways 27L and 27R, that configuration is still inferior to full utilization of parallel east-west runways for daytime arrivals and departures.

Regarding your questions on "Alternative Runway Configurations", your questions are focused on possible alternative runway configurations that might be able to be used during hours when arrival/departure rates are lower than at peak hours. As you know, the CDA, with the assistance of the ONCC, has undertaken an initiative to look at this very subject, beginning with alternative runway configurations that might be feasible during nighttime "Fly Quiet" hours. The FAA serves as a technical resource to CDA and ONCC on this initiative. As there are community impacts with any alternative runway configuration that may be considered, the FAA looks to CDA and to ONCC, as the representative voice of the full spectrum of communities and school districts surrounding O'Hare, to determine what options will be studied, and in what order, to create the best operating scenario for O'Hare and its surrounding communities. At this point in time, we suggest that FAiR convey its interests to CDA and ONCC, for consideration in the larger discussion on O'Hare noise that is currently taking place.

It is my hope that the above information adequately addresses at least some of FAiR's questions.

Sincerely,



for

Barry D. Cooper
Regional Administrator
Great Lakes Region