U.S. Department
of Transportation

**Federal Aviation
Administration**

Office of the Administrator

800 Independence Ave., S.W.
Washington, D.C. 20591

November 10, 2016

The Honorable John Thune
Chairman, Committee on Commerce,
Science, and Transportation
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

In accordance with Section 804 of the FAA Modernization and Reform Act of 2012, I am pleased to provide you with the final Federal Aviation Administration (FAA) National Facilities Realignment and Consolidation Report, Part 2. The Report was published in the Federal Register from June 7 through July 22, 2016, and public comments were requested. Twenty-three comments were received and are appended to the Report. The Report was not otherwise significantly modified.

To develop this report, we formed a workgroup of representatives from the FAA, the National Air Traffic Controllers Association, and the Professional Aviation Safety Specialists. This workgroup formulated a comprehensive process to analyze different realignment and consolidation scenarios and incorporated input from industry stakeholders.

The realignment recommendations outlined in the report are the result of a collaborative process that we believe provides a stable foundation for any future realignment analyses or recommendations.

We have sent identical letters to Chairman Shuster, Senator Nelson, and Congressman DeFazio.

If I can be of further assistance, please contact me or Kate Howard, Acting Assistant Administrator for Government and Industry Affairs, at (202) 267-3277.

Sincerely,

Michael P. Huerta
Administrator

Enclosure

U.S. Department
of Transportation

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Administration**

Office of the Administrator

800 Independence Ave., S.W.
Washington, D.C. 20591

November 10, 2016

The Honorable Bill Nelson
Ranking Member, Committee on Commerce,
Science, and Transportation
United States Senate
Washington, DC 20510

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November 10, 2016

The Honorable Bill Shuster
Chairman, Committee on Transportation
and Infrastructure
House of Representatives
Washington, DC 20515

Dear Mr. Chairman:

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Office of the Administrator

800 Independence Ave., S.W.
Washington, D.C. 20591

November 10, 2016

The Honorable Peter A. DeFazio
Ranking Member, Committee on Transportation
and Infrastructure
House of Representatives
Washington, DC 20515

Dear Congressman DeFazio:

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U.S. Department of Transportation (DOT)
Federal Aviation Administration (FAA)
Section 804 Collaborative Workgroup

FAA National Facilities Realignment and Consolidation Report
Part 2 Recommendations

Response to U.S. Congress

FAA Reauthorization Bill

Public Law 112-95

Section 804

Submission Date: August 3, 2016

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Executive Summary

A collaborative workgroup of representatives from the Federal Aviation Administration (FAA), the National Air Traffic Controllers Association (NATCA) and the Professional Aviation Safety Specialists (PASS) labor unions was established to analyze FAA's Terminal Radar Approach Control (TRACON) facilities for realignment, pursuant to Section 804 of the FAA Modernization and Reform Act of 2012 (P.L. 112-95).

The Section 804 collaborative workgroup conducted comprehensive analysis of TRACON operations by gathering and reviewing operational and technical requirements for facilities being reviewed, considering workforce impacts, gathering and evaluating stakeholder input, and estimating costs and benefits of potential realignments.

The workgroup developed, validated, and presented its realignment recommendations to FAA and labor union leadership, and drafted this report for the FAA Administrator's review and submission to the Federal Register and to Congress.

The following recommendations are contained in this report:

1. Realign Erie, PA (ERI) TRACON operations to Buffalo, NY (BUF) Tower / TRACON
2. Realign Akron-Canton, OH (CAK) and Mansfield, OH (MFD) TRACON operations to Cleveland, OH (CLE) Tower / TRACON
3. Realign Grand Rapids, MI (GRR), Lansing, MI (LAN), Muskegon, MI (MKG), Flint, MI (FNT), and Saginaw, MI (MBS) TRACON operations to Kalamazoo, MI (AZO) Tower / TRACON
4. Sustain and maintain Toledo, OH (TOL) TRACON operations at the current location
5. Sustain and maintain Youngstown, OH (YNG) TRACON operations at the current location

Per statutory requirements, the justification and details for the collaboratively developed recommendations are provided in the sections below.

Introduction

Section 804 of the Federal Aviation Administration (FAA) Modernization and Reform Act of 2012 (P.L. 112-95) requires the FAA to develop a plan for realigning and consolidating facilities and services in an effort to support the transition to NextGen, and to reduce capital, operating, maintenance, and administrative costs where such cost reductions can be implemented without adversely affecting safety.

To comply with Section 804 requirements, the FAA formed a collaborative workgroup with the National Air Traffic Controllers Association (NATCA) and the Professional Aviation Safety Specialists (PASS) labor unions. The workgroup developed a comprehensive process for facilities and service realignment analysis, and was chartered to conduct the analysis and to develop recommendations, taking the following factors into consideration:

- NextGen readiness of facilities
- Terminal Automation Modernization and Replacement (TAMR) program schedule
- Operational and airspace factors
- Existing facility conditions and workforce impacts
- Industry stakeholder input
- Costs and benefits associated with each potential realignment alternative
- Facilities and engineering planning and priorities
- Employee career development

Per statutory requirements, the realignment recommendations are developed in coordination with the FAA's Chief NextGen Officer and the Chief Operating Officer of the Air Traffic Organization (ATO), and are approved by the FAA Administrator.

Section 804 Collaborative Workgroup

The Section 804 collaborative workgroup developed the guiding principles and criteria for evaluating existing TRACON operations. The principles support the goals of developing operationally viable realignment and consolidation scenarios, capturing recommendations, and outlining next steps.

The workgroup has developed a repeatable and defensible four-step process to:

- Evaluate facility TRACON operations and prioritize for analysis
- Determine an initial set of realignment scenarios and a set of alternatives for each scenario
- Collect facility and operational data, and document system requirements
- Document facility, equipment, infrastructure, operational and safety data
- Capture qualitative workforce considerations, including training, transition, facility, and potential workforce impacts of potential realignments

- Consider potential impacts on operations, airspace modifications, route / fix changes, arrival / departure procedures, intra / inter-facility coordination, and pilot community interaction
- Collect and consider industry stakeholder input
- Quantify benefits and cost of potential realignments
- Develop a recommendation for each realignment scenario

Four-Step Process for Facilities Realignment Analysis

Each step of the process developed by the workgroup is outlined below:

Section 804 Four-Step Process Overview

The process serves as the platform for analyzing ATC facilities and services for potential realignments. To evaluate the realignment scenarios, the workgroup conducts working sessions at FAA headquarters, followed by site surveys at all facilities under analysis. At each facility the workgroup leadership facilitates sessions with facility management, labor representatives, and stakeholders. Stakeholders are briefed on the process, and meetings are held to answer questions and collect input.

The workgroup's technical and operational experts evaluate the airspace, equipment, facility, operational, and safety factors for each alternative in the analysis, and document the findings in Systems Analysis and Requirements Documents (SARDs), which serve as the basis for subsequent business case analysis. Workforce impact considerations, and future staffing and training requirements are captured, documented, and reviewed by the workgroup prior to making recommendations.

Throughout each step of the analysis, the workgroup interfaces with multiple FAA programs and organizations to fully inform its analysis and provide regular updates. The workgroup continually improves its processes by reviewing lessons learned from previous realignments, eliciting feedback from the facilities undergoing analysis, and refining working activities.

Realignment recommendations resulting from the four-step process are developed to:

- Maintain or improve operational safety and ensure service resilience

- Facilitate transition to NextGen
- Enable operational improvements
- Improve facility conditions
- Prioritize current and future investments
- Utilize agency assets more effectively
- Enhance controller proficiency
- Enhance career development and training opportunities

The workgroup operates in conjunction with the agency's NextGen deployment initiatives and schedules, and focuses on smaller TRACON facilities and operations. In the future, the process and analysis may be adapted to include the FAA's larger ATC facilities. However, at this time, the FAA does not have the necessary funds or planning capacity to consider these facilities for realignments or consolidations.

Report Scope

This report contains the details and results of analyzing 19 TRACON facilities. The majority of facilities included in this report were considered legacy sites – those sites were identified by the FAA to be realigned prior to enactment of Section 804 of the FAA Modernization and Reform Act of 2012 and workgroup establishment.

FAA Administrator's Recommendations

The following recommendations are contained in this report:

1. Realign Erie, PA (ERI) TRACON operations to Buffalo, NY (BUF) Tower / TRACON
2. Realign Akron-Canton, OH (CAK) and Mansfield, OH (MFD) TRACON operations to Cleveland, OH (CLE) Tower / TRACON
3. Realign Grand Rapids, MI (GRR), Lansing, MI (LAN), Muskegon, MI (MKG), Flint, MI (FNT), and Saginaw, MI (MBS) TRACON operations to Kalamazoo, MI (AZO) Tower / TRACON
4. Sustain and maintain Toledo, OH (TOL) TRACON operations at the current location
5. Sustain and maintain Youngstown, OH (YNG) TRACON operations at the current location

Details for each realignment scenario and recommendation are provided in the sections below.

Recommendation #1: Realign Erie (ERI) TRACON Operations to Buffalo (BUF)

The Section 804 workgroup evaluated ERI TRACON operations for realignment to BUF, CLE, or Pittsburgh (PIT) Tower / TRACON.

Background

ERI Tower / TRACON was constructed in 1957. The local airport authority owns the facility and leases it to the FAA. In 1987 the facility was converted from a Terminal Radar Approach Control in Tower Cab TRACAB to a Tower / TRACON configuration. In 2004, the facility underwent a complete refurbishment. ERI is an ATC level 5 and the hours of operation are 0600-2400. ERI TRACON operations in CY 2014 were 33,929 annually.[1]

BUF Tower / TRACON was constructed in 1994. The FAA owns the facility. BUF is an ATC level 8 facility and it operates 24 hours a day. BUF is sufficiently sized to accommodate ERI TRACON operations. BUF TRACON operations in CY 2014 were 138,229 annually.

Approach

The workgroup conducted a working session at FAA headquarters, followed by stakeholder meetings and site surveys at ERI, CLE, BUF, and PIT.

During the evaluation, CLE and PIT were removed from further consideration because there were no operational synergies or other indicators supporting further analysis of realignment.

Some ERI stakeholders expressed concerns regarding the potential loss of local knowledge relating to interaction with Canadian ATC facilities and unique weather patterns, such as lake-effect snow, in the Erie area. Both ERI and BUF facilities have existing communications with Canadian ATC facilities and experience similar weather patterns.

Recommendation and Administrator's Justification

Upon applying the agreed-upon process and analysis, the workgroup recommends realigning ERI TRACON operations to BUF.

Pursuant to the statute, realignment to BUF could accelerate the transition to NextGen-enabling automation for ERI airspace. BUF is a NextGen-enabled facility built to current design and safety standards, with ample space and existing capacity to accommodate ERI operations. ERI and BUF have contiguous airspace. Both facilities acknowledged limited RADAR coverage in the Jamestown airspace that could be improved by realigning ERI operations to BUF and merging the airspace between the two facilities. With airspace redesign, operational benefits such as reductions in boundary coordination could improve the current airspace efficiency.

At the time of analysis, ERI was one of the five slowest TRACONs in the NAS. The low level of operations presents a challenge in training and certifying controllers at ERI TRACON.

BUF TRACON can accept ERI operations with minimal facility expansion or reconfiguration.

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[1] FAA OpsNet was a source for all CY 2014 facility traffic counts quoted throughout this document.

Projected Costs and Savings

The ERI business case indicates that realignment of ERI TRACON operations to BUF provides a slightly negative return-on-investment, given the project lifecycle duration of 2015 to 2034, with the B/C ratio of 0.984, and an NPV of -$159.7K. A B/C ratio of 1 or above is considered positive. The costs and benefits were estimated conservatively: only 50% of the potential air traffic staffing efficiencies were taken into account and the resulting number was further risk-adjusted to the 80% confidence level, in accordance with FAA and OMB guidance. If calculated using 100% of expected staffing efficiencies, the B/C ratio would increase to 1.08 with a NPV of $788.5K.

The primary cost drivers were salary increases related to moving from the existing ATC level 5 (ERI) facility to an ATC level 8 (BUF) facility. Other key realignment costs included planning, site preparation/installation, controller and technician training and overtime, and Permanent Change of Station (PCS) compensation.

Savings include the avoidance of purchasing and refreshing a STARS system and scheduling efficiencies for both ERI and BUF personnel upon realignment.

Business Case Summary Tables for ERI

Table 1: Cost Summary (Risk Adjusted, Then-Year $K)

Type	Mod-Sustain	Realign
Investment F&E Total	$3,582	$2,082
Indirect F&E Total	$134,698	$131,102
O&M Total	$474,850	$480,562

Table 2: Economic Analysis Summary (Risk Adjusted, Present Value $K)

Type	Mod-Sustain	Realign
Realignment Costs	-	$10,062
Cost Savings/Avoidance	-	$9,902
Net Present Value (NPV)	-	-$159.7
B/C Ratio	-	0.984

Recommendation # 2: Realign Akron-Canton (CAK) and Mansfield (MFD) TRACON Operations to Cleveland (CLE)

The workgroup evaluated CAK TRACON operations for realignment to PIT or CLE. Concurrently, the workgroup evaluated MFD TRACON operations for realignment to Columbus (CMH) Tower / TRACON or CLE Tower / TRACON.

Background

CAK Tower / TRACON was constructed in 1961. The FAA leases the CAK structure. In the event of CAK TRACON realignment to CLE, the agency would continue to lease portions of this space to operate the CAK Tower. CAK is an ATC level 7 facility, and it operates 24 hours a day for Tower and 0600-2400 for the TRACON. CAK TRACON operations in CY 2014 were 101,321 annually.

MFD Tower / TRACON was constructed in 1974. The FAA owns the facility. The MFD equipment room is at capacity for any future equipment that may be deployed. MFD is an ATC level 5 facility, and the hours of operation are 0600-2300. MFD TRACON operations in CY 2014 were 31,702 annually.

CMH Tower / TRACON was constructed in 2004. The FAA owns the facility. CMH is an ATC level 9 facility, and it operates 24 hours a day. CMH TRACON operations in CY 2014 were 322,744 annually.

PIT Tower / TRACON was constructed in 1985. The FAA owns the facility. PIT is an ATC level 9 facility, and it operates 24 hours a day. PIT TRACON operations in CY 2014 were 249,856 annually.

CLE is an ATC level 9 facility, and it operates 24 hours a day. The FAA owns the facility. CLE TRACON operations for CY 2014 were 198,463.

The FAA commissioned a new CLE Tower / TRACON in September 2015 with an overall cost of approximately $75M:

- The agency's investment into the new CLE Tower / TRACON is considered sunk cost and therefore was not accounted for in the current realignment business case, in accordance with standard accounting practices.
- The new CLE facility was designed and constructed to accommodate the realignments of TOL, MFD, CAK, and YNG TRACONs. This plan was developed before Section 804 of the FAA Modernization and Reform Act of 2012 was enacted.
- The new CLE Tower / TRACON is a state-of-the art facility with redundant engine generators, uninterruptible power supply (UPS) / power conditioning system (PCS), and environmental systems.

Approach

The workgroup conducted working sessions at FAA headquarters and in Columbus, OH, followed by stakeholder meetings and site surveys at CAK, MFD, CMH, PIT, and CLE.

Recommendation and Administrator's Justification

Upon applying the agreed-upon process and conducting analysis, the workgroup recommends realigning CAK and MFD TRACON operations to CLE.

The realignments support the transition to NextGen-enabling automation for the CAK and MFD airspace and enable 24-hour approach control service for CAK and MFD.

Future airspace redesign, which may be enabled by the realignment, is expected to result in operational benefits such as reductions in boundary coordination.

At the time of the analysis, MFD was one of the five slowest TRACONs in the NAS. The low level of operations there present a challenge in training and certifying controllers in the TRACON. Realignment to CLE may provide the relocated workforces with enhanced career progression opportunities, and create a more effective training environment through additional levels of complexity and higher traffic volume. The realignments will allow for the efficient use of the new CLE facility, which was designed and built to accommodate these facilities. Employees currently working in aging facilities will operate in a NextGen-enabled state-of-the-art facility that meets current standards and building codes.

While some CAK stakeholders expressed concern about the potential loss of local knowledge, other stakeholders favored the realignment as it would provide 24-hour-a-day approach control service.

Projected Costs and Savings

The CAK and MFD business case indicates that realignment to CLE provides a slightly negative return-on-investment, given the project lifecycle duration of 2015 to 2034, the benefit to cost (B/C) ratio of 0.95, and a negative NPV of just under $1M. The costs and benefits were estimated conservatively: only 50% of the potential air traffic staffing efficiencies were taken into account and the resulting number was then further risk-adjusted to the 80% confidence level, in accordance with FAA and OMB guidance. If calculated using 100% of expected staffing efficiencies, the B/C ratio would increase to 1.47 with a NPV of $8.2M.

The estimated cost of realigning CAK and MFD TRACON operations to CLE is $18.21M. The primary cost drivers were salary increases related to moving from the existing lower ATC level facilities (CAK, MFD) to an ATC level 9 (CLE) facility.

The estimated cost savings are approximately $17.24M. The CAK and MFD realignments will offer savings in equipment and technology refreshment over "mod-sustain" alternative, as well as controller salary savings through scheduling efficiencies. Additional salary savings are realized in the long term due to the lowered ATC level of CAK and MFD Towers.

Business Case Summary Tables for CAK and MFD

Table 1: Cost Summary (Risk Adjusted, Then-Year $K)

Type	Mod-Sustain	Realign
Investment F&E Total	$9,156	$5,458
Indirect F&E Total	$356,595	$358,280
O&M Total	$1,052,632	$1,060,525

Table 2: Economic Analysis Summary (Risk Adjusted, Present Value $K)

Type	Mod-Sustain	Realign
Realignment Costs	-	$18,214
Cost Savings/Avoidance	-	$17,241
Net Present Value (NPV)	-	-$972.9
B/C Ratio	-	0.947

Recommendation #3: Realign Grand Rapids (GRR), Lansing (LAN), Muskegon (MKG), Flint (FNT), and Saginaw (MBS) TRACON Operations to Kalamazoo (AZO)

The workgroup evaluated the following realignment scenarios:

- GRR TRACON operations for potential realignment to AZO or South Bend (SBN)
- MKG TRACON operations for potential realignment to AZO, SBN, or Milwaukee (MKE)
- FNT TRACON operations for potential realignment to AZO or Detroit (D21)
- LAN TRACON operations for potential realignment to AZO or D21
- MBS TRACON operations for potential realignment to AZO or D21
- Fort Wayne (FWA) TRACON operations for potential realignment to AZO or SBN

Background

GRR Tower / TRACON was constructed in 1963. The FAA owns the facility. GRR is an ATC level 7 facility, and its hours of operation are 0530-2400. GRR TRACON operations for CY 2014 were 97,884.

MKG Tower was commissioned in 1967, originally in a TRACAB configuration. The TRACON was commissioned in 1979 with the addition of a base building. The FAA owns the facility. MKG is an ATC level 5 facility, and its hours of operation are 0600-2300. MKG TRACON operations for CY 2014 were 47,376.

MBS Tower / TRACON was constructed in 1966. The FAA owns the facility. MBS is an ATC level 5 facility, and its hours of operation are 0600-2300. MBS TRACON operations for CY 2014 were 43,598.

FNT Tower / TRACON was constructed in 1997. The FAA owns the facility. FNT is an ATC level 5 facility, and its hours of operation are 0545-2330. FNT TRACON operations for CY 2014 were 51,298.

LAN Tower / TRACON was constructed in 1958. The FAA owns the facility. LAN is an ATC level 6 facility, and it operates 24 hours a day. LAN TRACON operations for CY 2014 were 80,721.

AZO Tower / TRACON was commissioned in 2014. The FAA owns the facility. AZO is an ATC level 6 facility, and its hours of operation are 0600-2300. AZO TRACON operations for CY 2014 were 72,133.

The AZO TRACON was designed to accommodate additional TRACON positions. The overall cost of the facility was approximately $28M:

- The agency's investment into the AZO Tower / TRACON is considered sunk cost and therefore was not accounted for in the current realignment business cases, in accordance with standard accounting practices.
- The AZO Tower / TRACON facility was designed and constructed to accommodate the realignments of GRR, MKG, and LAN TRACON operations. This plan was developed before Section 804 of the FAA Modernization and Reform Act of 2012 was enacted.
- The new AZO Tower / TRACON is a state-of-the art facility with redundant engine generators, UPS / PCS, and environmental systems.

Approach

The workgroup conducted working sessions at FAA headquarters and field sessions in Saginaw and Flint, MI, followed by stakeholder meetings and site surveys at MBS, FNT, LAN, MKG, GRR, FWA, D21, MKE, SBN, and AZO.

The initial scope of the analysis included GRR, MKG, LAN, and FWA. Based on facility input during the working sessions and site surveys, the workgroup determined that inclusion of MBS and FNT would provide a more comprehensive analysis of the facilities in the region.

FWA, D21, SBN, and MKE were removed from further consideration during the evaluation process due to lack of operational synergies or other indicators supporting further realignment analysis.

Recommendation and Administrator's Justification

Upon applying the agreed-upon process and conducting analysis, the workgroup recommends realigning GRR, MKG, MBS, FNT, and LAN TRACON operations to AZO Tower / TRACON.

The realignments support the transition to NextGen-enabling automation for the GRR, MKG, MBS, FNT, and LAN airspace. The realignment will enable 24-hour approach control service for GRR, MKG, MBS, and FNT. LAN currently has 24-hour approach control service.

Future airspace redesign, which may be enabled by the realignment, is expected to result in operational benefits such as reductions in boundary coordination.

At the time of analysis, MKG and MBS were some of the slowest TRACONs in the NAS. The low level of operations in those facilities presents a challenge in training and certifying controllers in the TRACON. The opportunity to train and develop controllers at mid-level facilities should help to prepare certified candidates for busier facilities. The realignments are expected to enhance controller career progression opportunities, and will allow the new AZO TRACON facility to be used more efficiently. Upon realigning TRACON operations to AZO, employees will operate in a NextGen-enabled state-of-the-art facility that meets current standards and building codes.

Projected Costs and Savings

The GRR, MKG, MBS, FNT, and LAN business case indicates that realignment of TRACON operations from those facilities to AZO provides a positive return-on-investment, given the project lifecycle duration of 2015 to 2034, with a positive benefit to cost (B/C) ratio of 1.055, and an NPV of $3.6M. The costs and benefits were estimated conservatively: only 50% of the potential air traffic staffing efficiencies were taken into account and the resulting number was then further risk-adjusted to the 80% confidence level, in accordance with FAA and OMB guidance.

The primary costs are implementation planning, telecommunications, transition, training, overtime, staff relocation costs, and additional staffing costs due to facility level upgrades.

Primary savings are in staffing scheduling efficiencies and the Prime Mission Equipment (PME) cost avoidance of purchasing and refreshing STARS at GRR, MKG, MBS, FNT, and LAN.

Business Case Summary Tables for GRR, MKG, MBS, FNT and LAN

Table 1: Cost Summary (Risk Adjusted, Then-Year $K)

Type	Mod-Sustain	Realign
Investment F&E Total	$15,218	$9,413
Indirect F&E Total	$328,740	$310,956
O&M Total	$753,357	$774,191

Table 2: Economic Analysis Summary (Risk Adjusted, Present Value $K)

Type	Mod-Sustain	Realign
Realignment Costs	-	$65,417
Cost Savings/Avoidance	-	$69,002
Net Present Value (NPV)	-	$3,584.7
B/C Ratio	-	1.055

Recommendation #4: Sustain and Maintain TRACON Operations at Toledo (TOL)

The workgroup evaluated TOL TRACON operations for realignment to CLE, D21, or AZO.

Background

The TOL facility was constructed in 1967. The structure is leased from the Toledo Airport Authority, and operated and maintained by the FAA. The facility is in need of modernization. The equipment room is at capacity for any future equipment that may be deployed. TOL is an

ATC level 6 facility, and it operates 24 hours a day. TOL TRACON operations for CY 2014 were 83,129.

D21 was commissioned in 1992. The FAA owns the facility. D21 is an ATC level 11 facility, and it operates 24 hours a day. D21 TRACON operations for CY 2014 were 522,752.

Approach

To analyze the scenario, the workgroup conducted a working session at FAA headquarters, followed by site surveys and stakeholder meetings at TOL, CLE, D21, and AZO. Two realignment alternatives (TOL to CLE and TOL to AZO) were eliminated due to the lack of operational advantages or expected cost savings of realigning to those sites.

Recommendation and Administrator's Justification

Upon applying the agreed-upon process and conducting analysis, the workgroup recommends sustaining and maintaining TOL TRACON operations at the current location.

Airspace operations between D21 and TOL are closely aligned, and improvement in air traffic flows could possibly result from realignment.

While realignment to D21 would support the transition to NextGen-enabling automation for TOL airspace, the estimated increase in lifecycle costs result in a significantly negative return-on-investment.

Projected Costs and Savings

The TOL to D21 business case indicates that realignment of TRACON operations to D21 does not provide a positive return-on-investment, given the project lifecycle duration of 2015 to 2034 and a negative benefit to cost (B/C) ratio of 0.6, and an NPV of negative $8.97M. The costs and benefits were estimated conservatively: only 50% of the potential air traffic staffing efficiencies were taken into account and the resulting number was then further risk-adjusted to the 80% confidence level, in accordance with FAA and OMB guidance.

Primary cost drivers are controller salary increases associated with moving from an existing ATC level 6 (TOL) to an ATC level 11 (D21) facility, as well as STARS equipment acquisition at D21, facility modification at D21, and transition, training, overtime, and PCS costs.

These costs are greater than the savings and the cost avoidance of STARS procurement and facility modernization at TOL.

Due to the significant negative return-on-investment, the workgroup does not recommend this realignment, despite potential operational benefits.

Business Case Summary Tables for TOL

Table 1: Cost Summary (Risk Adjusted, Then-Year $K)

Type	Mod-Sustain	Realign
Investment F&E Total	$3,764	$5,348
Indirect F&E Total	$383,299	$382,941
O&M Total	$1,098,790	$1,110,296

Table 2: Economic Analysis Summary (Risk Adjusted, Present Value $K)

Type	Mod-Sustain	Realign
Realignment Costs	-	$22,847
Cost Savings/Avoidance	-	$13,879
Net Present Value (NPV)	-	-$8,968.0
B/C Ratio	-	0.607

Recommendation #5: Sustain and Maintain TRACON Operations at Youngstown (YNG)

The Section 804 workgroup evaluated YNG TRACON operations for potential realignment to PIT or CLE.

Background

YNG Tower / TRACON was constructed in 1970. The FAA owns the facility. YNG is an ATC level 5 facility, and it operates 24 hours a day at the Tower and 0600-2400 at the TRACON. YNG TRACON operations for CY 2014 were 44,416.

PIT Tower / TRACON was constructed in 1985. The FAA owns the facility. PIT is an ATC level 9 facility, and it operates 24 hours a day. PIT TRACON operations for CY 2014 were 249,856 annually.

CLE Tower / TRACON is an ATC level 9 facility, and it operates 24 hours a day. The FAA owns the facility. CLE TRACON operations for CY 2014 were 198,463.

The FAA commissioned a new CLE Tower / TRACON in September 2015 with an overall cost of approximately $75M:

- The agency's investment into the new CLE Tower / TRACON is considered sunk cost and therefore was not accounted for in the current realignment business case, in accordance with standard accounting practices.

- The new CLE facility was designed and constructed to accommodate the realignments of TOL, MFD, CAK, and YNG TRACONs. This plan was developed before Section 804 of the FAA Modernization and Reform Act of 2012 was enacted.
- The new CLE Tower / TRACON is a state-of-the art facility with redundant engine generators, UPS / PCS, and environmental systems.

Approach

The workgroup conducted working sessions at FAA headquarters, followed by stakeholder meetings and site surveys in YNG, PIT, and CLE.

Recommendation and Administrator's Justification

Upon applying the agreed-upon process and conducting analysis, the workgroup recommends sustaining and maintaining YNG TRACON operations at the current location.

The recommendation is made because of the significant costs associated with potential realignment and lack of operational efficiencies between YNG and either PIT or CLE.

Projected Costs and Savings

The workgroup investigated multiple YNG realignment alternatives, however the resulting business cases were not favorable. The business case analysis for YNG indicates realignment of TRACON operations to either CLE or PIT would not provide a positive return on investment in any realignment alternative, given the project lifecycle duration of 2015 to 2034. The realignment of YNG to PIT was the least negative alternative with a BC ratio of 0.7, and a NPV of negative $3M.

The costs and benefits were estimated conservatively: only 50% of the potential air traffic staffing efficiencies were taken into account and the resulting number was then further risk-adjusted to the 80% confidence level, in accordance with FAA and OMB guidance.

Primary cost drivers were staffing costs, with a significant increase in air traffic controller salaries associated with moving from ATC level 5 facility (YNG) to ATC level 9 (PIT) facility.

Primary cost savings were the cost avoidance of purchasing and refreshing STARS equipment at YNG. However, the costs were far greater than the cost avoidance or savings offered by realignment.

Due to the significant negative return-on-investment of any YNG scenarios, the workgroup does not recommend this realignment, despite potential operational benefits.

Business Case Summary Tables for YNG

Table 1: Cost Summary (Risk Adjusted, Then-Year $K)

Type	Mod-Sustain	Realign
Investment F&E Total	$2,890	$2,085
Indirect F&E Total	$304,109	$308,274
O&M Total	$883,533	$891,903

Table 2: Economic Analysis Summary (Risk Adjusted, Present Value $K)

Type	Mod-Sustain	Realign
Realignment Costs	-	$10,344
Cost Savings/Avoidance	-	$7,348
Net Present Value (NPV)	-	-$2,995.5
B/C Ratio	-	0.710

Proposed Timing for Implementation of Recommendations

The implementation of facility and operational realignments and staff moves are subject to current labor and FAA collective bargaining agreements, which require a 12 month notification to the workforce as well as other FAA policies, and regulations. The FAA currently plans to notify the workforce of the recommendations in 2016, initiate project implementation in 2017, and conduct the cutovers in 2018. Implementation of each realignment is contingent on funding and resource availability.

Conclusion

The realignment recommendations outlined in this report are the result of a collaborative process that involved a multi-disciplinary workgroup of representatives from FAA management, labor, field facilities, finance, and subject matter experts.

The repeatable and defensible process developed by the workgroup serves as a stable foundation for realignment analyses and recommendations that will be developed in the future. The process will be used to maximize operational, administrative, and maintenance efficiencies, support transition to NextGen, and deliver the highest value to stakeholders.

Through continuous analysis and assessment of facilities through this process, the FAA supports its goal of ensuring safe and secure operations across the nation.

The FAA's success in conducting realignment analysis, continuing to develop realignment recommendations, and implementing those realignments is contingent upon stable multi-year funding, continued collaboration with labor unions, and coordination with industry stakeholders.

Federal Register Publication

Following the process outlined in Section 804 of the FAA Modernization and Reform Act of 2012, the FAA published the National Facilities Realignment and Consolidation Report, Part 2, in the Federal Register for public review and comment from June 7 to July 22, 2016. Twenty-three comments were received. A copy of the comments is included as an appendix to this report.

Appendix A: Federal Register Comments

Public Comment Period: 6/7/16 – 7/22/16

DATE POSTED	COMMENT	AUTHOR
1. 6/8/16	*This is in regards to Recommendation #4 Sustain and Maintain TRACON Operations at Toledo (TOL). It appears there are short term cost savings for keeping Toledo TRACON in its current location instead of moving it to D21. However, in the long term, a new TRACON will need to be constructed. Taking this into account, it may be much cheaper to move the equipment to D21. As noted in the report, there is no room left in the Toledo equipment room for expansion. The facility is at capacity. A short term investment for a long term savings seems like the better option in this instance. In addition, it would not be a large move for most controllers to move to D21 as it is less than an hour away. With most facilities like TOL in the area consolidating, it makes sense that TOL should as well. Long term it would save money on personnel and equipment costs by reducing both the number of controllers needed to run the sector and the need for additional separate equipment. I recommend Toledo TRACON is relocated to D21 TRACON.*	Fred Randall
2. 6/9/16	*CAK and MFD TRACON are very important to operations at KBJJ. KBJJ is located half way between the two airports. As a part 91 corporate turbo prop operation based at KBJJ, MFD and CAK closely manage our IFR operations. Understanding our needs and demands to operate safely out of a non- towered airport. Also MFD and CAK have done an excellent job maintaining runway incursion to a minimum due to a "back taxi" operation because of a lack of a parallel taxi way. KBJJ is located in Wayne County, Ohio. And is home to major Fortune 500 Companies. This has resulted in an increase in IFR corporate jet traffic , life flight , and military training etc. I recommend not to consolidate. Or to consider staffing a part time control tower KBJJ.*	Dave Nicholas Wadsworth, OH
3. 6/9/16	*I oppose the consolidation of CAK under CLE for two reasons: 1) When working with a local controller directly I find their willingness to engage and proactively be helpful to be much better than when dealing with remote operators/towers. It's as if "this is their own backyard" they want to protect and support. Operations tend to be more "efficient" (you usually know what can and can't be done to make things a little easier) and they tend to more proactively help with transitions. I think there are two primary reasons: the first I already alluded to this is their backyard, the second is they tend to have fewer things going on and so I have a much larger % of their attention 2) As a flight instructor I find the smaller tower operations much easier for my students (and me, frankly) to work with. With less "stuff" going on on the radio my students are more comfortable with the controllers and our approach work is much more efficient. This environment is much*	Mark Spatz, Akron, OH

	much more conducive to a positive training environment and my student progress faster and more comfortably in this environment. Faster + better = higher quality I am a 10,000 hour ATP with CFII and CFI (Glider) ratings. I fly in the area both in turbine equipment under charter/commercial ops and also as an instructor (both in airplanes and gliders).	
4. 6/10/16	*I believe that CAK Approach Control Facilities should remain independent for CLE TRACON. Regardless of the present CBA, the future of CAK air traffic both in GA and Scheduled Air Carrier will only increase. So from a safety and business perspective, CAK Approach Control must continue as currently operating for the foreseeable future!*	Herman Valentine Canton, OH
5. 6/11/16	*I have been flying for over 46 years out of CAK. I learned here and have kept my planes here. I am a CFII as such I have flown in and out of CLE. At many time the CLE facilities are very busy I realize cost is a major factor but safety is too. Many of the local flight schools use CAK and MFD for student control work. CAK is also used for controller training. Seems like saving dimes and spending dollars at the cost of safety.*	David Hutton
6. 6/11/16	*I believe we should keep Akron TRACON and not consolidate with Cleveland. Traffic control is already so distant, impersonal and busy with such high workloads I feel this would only exacerbate the problem.*	Max Doner Stockport, OH
7. 6/12/16	*This is the best idea ever. What an excellent way to save money and streamline air traffic in these areas.*	Tanja Rowland
8. 6/14/16	*After reviewing this report, I cannot help but wonder how these decisions were made. As a tax payer, this report infuriates me. I specifically look at the CAK and MFD case being moved to CLE. Everything in the report indicates that these facilities should not relocate, but yet the recommendation is that they move. The report admits that it will cost near $1M more to move the facilities, than to sustain them. Our country is cannot afford to spend money, without a positive return. This report indicates a negative return. I do not follow the logic, or lack thereof, used to formulate this decision.*	Anonymous
9. 6/15/16	*As a long time pilot and continuing student pilot, I see major safety and practical concerns with this realignment. This specific area is a large training area for Kent State, OSU, American Winds Flight Academy, Long Aviation, and several other flight schools which are direct feeder schools for your airlines. The services and training ACC, and MA, provide are invaluable to safety and the success of these students as well as the general aviation community.* *1. Akron Canton controllers (ACC) and Mansfield Approach (MA) know the local area. If a student pilot or local pilot makes a reference to something on the ground ATC will know exactly where they are at* *2. ACC are able to assist into or discovery flight and photo flights as they are familiar to local landmarks and their location to the Akron Canton Regional Airport (KCAK) and Mansfield Airport (KMFD), their flight path to the active runways, and the local tower boundaries*	Dennis Dunn Canton, OH

	3. ACC is familiar with the local flight schools and aviation business. When ACC knows the airplanes as they do they provide quality feedback as to how their pilots are doing or with there is any problems. EX: the local flight schools have hundreds of student pilots flying around and as they mean well to do a good job sometimes they need the assistance of the ACC. In talking with ACC and MA they make students feel confident they can ask for help and not worry about being afraid to ask. *4. ACC assists area instrument pilots and the flight schools in practicing approaches. These approaches keep pilots current and safe during their flights in IMC (instrument conditions).* *5. ACC allows for tours of their facilities to educate pilots on their operations and how their flying, radio calls and other factors provide for a safe environment.* *6. Ask Cleveland how much time they can devote to no gyro approaches during the day!*	
10. 6/19/16	*I work at the facility. It took me a while to get certified in RADAR but I take pride that I accomplished it. Taking it away from CAK would take a big part of the entire rating accomplishment. We do a great job (with lousy staffing numbers) every day to serve the public trust, working "short" to accommodate general aviation pilots performing Visual Flight Rules operations and practice instrument approaches. Not to mention the commercial airlines and other various sorts of military missions, parachute jumping and spectator functions that exist throughout the year. Combining the RADAR to Cleveland won't effect any real positive change for the user. One might say that if money were no option then it wouldn't really matter. And I can see the point, but, leaving the RADAR keeps us attached to the area even more and allows the Air Traffic Control Specialists, in this area, to really take umbrage on the service they provide for the area which they may live. As it is the burden to the taxpayer is pretty much negligible when comparing savings. Maybe the government should think about cutting costs ELSEWHERE in our cumbersome system rather than effecting these paltry moves that only serve to divide the common man.*	Anonymous
11. 6/23/16	*Dear Team Members, I am a flight instructor based at the Youngstown Elser Airport (4G4) and I have been flying and teaching out of that location for 23 years. The services provided to me and my students by Akron Canton Terminal Radar Approach Control (TRACON) during that entire time frame have been of the highest caliber. VFR flight following has never been denied to either myself, or any of my students and as a result safety for each of those many flights has been heightened considerably. Whenever I'm operating in the IFR environment I rest easy knowing that CAK Approach Control is taking good care of me. It is of particular comfort to know that CAK Approach monitors our remote frequency and provides us with clearance delivery services in a very timely manner. I'm fearful that another facility further in distance and with a busier workload might be unable to provide the same level of service. I strongly suggest that the National Section 804 team vote*	Andrew Marinelli Youngstown, OH

	for the modernization of the Akron Canton Approach Control (TRACON) by installing NextGen technology. Respectfully, Andrew Marinelli CFI, CFII, MEI, Master flight instructor and FAASTeam member.	
12. 7/7/16	*On behalf of the Ashtabula County Airport Authority (ACAA) Board of Trustees, which owns and operates the Northeast Ohio Regional Airport (NEORA/KHZY), please accept this letter opposing the relocation of the Erie (ERI) TRACON Operations to Buffalo (BUF). Erie, as with Ashtabula County, is working hard to retain, support and attract new businesses to the region by maintaining, renewing the aviation infrastructure in support of the transition to NextGen. This is being accomplished by enhancing safety and reducing costs. The Ashtabula County Airport Authority is engaged in making $10,000,000 of improvements to the Northeast Ohio Regional Airport in accordance ARC C-11 facility requirements as a jet capable aviation infrastructure asset for Ashtabula County and the surrounding region. We view the Erie TRACON as an extension and enhancement to the Northeast Ohio Regional Airport facility due to the excellent service, information, and cooperation we receive from Erie. While it is understood that financial considerations are a large part of the recommendation to relocate the Erie facility, it is equally important to provide moral support in the form of local employment to service the airspace of the ground aviation assets. Based on the cost summary tables contained in the FAA National Facilities Realignment and Consolidations Report, Part 2 Recommendations (http://www.faa.gov/regulationspolicies/rulemaking/recently published/media/National Facilities Realignment Consolidation Report second report.pdf), the O&M Total Cost of $474,850.00 for ERI compared to $480,562.00 are not significant to warrant the relocation. Specifically, the people who man the Erie TRACON are part of the local aviation and economic development community. The loss of their engagement is difficult to quantify, but is absolutely real. The Northeast Ohio/Western New York & Pennsylvania Region is facing difficult economic times due to the decline in manufacturing and the coal industry. The FAA could and should send a vote of confidence to both the men and women who work at the Erie TRACON for their service to region by not relocating the facility.* *Respectfully submitted,* *Ashtabula County Airport Authority* *Northeast Ohio Regional Airport* *Dwight H. Bowden* *President*	Dwight H. Bowden Jefferson, OH
13. 7/11/16	*The Ashtaluba County Board of Commissioners is writing in opposition of the Federal Aviation Administrations proposed relocation of the TRACON operations from Erie to Buffalo, per recommendations contained in the FAA National Facilities Realignment and Consolidations report. The NE Ohio Regional Airport is a vital resource for Ashtaluba County with a total economic output of $5.5 million dollars. Fifty plus businesses in our region rely on the NE Ohio Regional*	Dan Claypool Casey Kozlowski Peggy Carlo Jefferson, OH

	Airport as a mode of efficient transportation. The Northeast Ohio Regional Airport was recognized by the Ohio Aviation Association as the 2015 Ohio Airport of the Year, further signifying the success of the airport. The Board of Commissioners has great concerns with any plans to further consolidate operations that can have an impact on our region's economy. This relocation will result in a reduction in local engagement that protects our airspace. Retaining this local partnership with Erie TRACON ensures a more comprehensive understanding of the region in which they serve. The airports relationship with Erie TRACON is vital to the support and development of our current operations as they provide excellent service, great information and stellar cooperation. There are extensive renovation and upgrades in process at the airport totaling $10,000,000 that would not have been made possible without the support of local partners. For these reasons, the Board of Commissioners opposes the proposed relocation of the Erie TRACON and strongly urges the FAA to reconsider this relocation. If you have any questions or need additional information, please contact us at (440) 576-3750 or via email at commissioners@ashtalubacounty.us. *Sincerely,* *ASHTALUBA COUNTY COMMISSIONERS*	Ashtaluba County Commissioners
14. 7/12/16	*Putting more faith into technology and reducing staff is not always the answer. You must find a balance that safeguards pilots and those passengers that fly with us. Consolidation of Akron Canton Approach (CAK TRACON) into Cleveland Approach (CLE TRACON) may sound good but puts technology in a critical position. I would like you to reconsider this and if you're looking to reduce government spending, consolidate our politicians instead. They bring less value and higher cost!*	Anonymous
15. 7/13/16	*I have flown out of CAK for thirty years. I currently have two of our Corporate aircraft stationed at CAK, a medium size jet and a single engine piston. The CAK TRACON has served our needs impeccably for decades. Their closeness to Akron Canton Tower facilitates a safe and practical transition from the Cleveland Center to Akron Canton Approach to Tower and a safe and expeditious arrival. So fundamentally I would vote for keeping the two major airport (CLE and CAK) TRACONS separate.*	Amir Novini Cuyahoga Falls, OH
16. 7/13/16	*I use CAK almost daily utilizing N2092W and N662RS. Approach control is very important to me.*	Ronald Siwik Chagrin Falls, OH
17. 7/13/16	*I own a Cessna 210 and fly out of Kent State (1G3). Local approach controllers at CAK are very useful because of the volume of traffic that Kent generates when they are training and the volume of traffic that they receive on weekends with good weather. I am not sure that Cleveland controllers, even by adding a few, would be able to take on all of the Mansfield and CAK traffic and keep our departures moving for all the practice approaches. The CAK controllers are also familiar with the pilot training they handle and are a bit more forgiving with deviations than I have experienced at Cleveland and Mansfield. From a*	Joseph Myers

	technology standpoint, I am sure it can be as safe as it is currently and, with ADSB in our future on radar coverage, it will be a much smaller issue. I can see a time when "approach" is consolidated in Oberlin leaving only the local tower and ground issues at the facilities.	
18. 7/13/16	*Please keep Akron TRACON They are so responsive and know my airspace!*	Drew Forhan
19. 7/17/16	*I do not feel that moving the arrival services into Akron/Canton to Cleveland will in anyway help in safety. The main issue is that in the event of an emergency, the pilot may reference local geographic locations to the tower, a Cleveland controller may not know the local landmarks being referenced. This idea seems very strange to consider. I would ask it stay the same.*	Robert Bennett Dover, OH
20. 7/18/16	*Specifically regarding the TRACON consolidation of the ERIE (ERI) to BUFFALO (BUF), I would like to make a comment on how disappointing this process was on so many levels. The lack of transparency throughout the entire process was disappointing. An example would be the delivery of the second Final Recommendation with what was called a "possible positive business case in favor of consolidation." Interestingly, none of the information to arrive at the "possible" outcome was presented, nor offered, and that justification was based on a murky "80%" formula with an even murkier explanation of what that formula meant. Based on past FAA programs, the decision that it will save money in the future is highly improbable at best when consideration is made that no FAA initiative done in the interest of saving funding has ever been successful.*	Eric Marendt
21. 7/19/16	*As the state representative of the 99th Ohio House District, which includes most of Ashtabula County, I write to oppose the relocation of the Erie (ERI) TRACON Operations to Buffalo (BUF). Erie, as with Ashtabula County, is working hard to retain, support and attract new businesses to the region by maintaining and renewing the aviation infrastructure in support of the transition to NextGen. This is being accomplished by enhancing safety and reducing costs. The Ashtabula Airport Authority is engaged in making $10 million worth of improvements to the Northeast Ohio Regional Airport in accordance with ARC C-II facility requirements as a jet capable aviation infrastructure asset for Ashtabula County and the surrounding region. The administrators of the Northeast Ohio Regional Airport view the Erie TRACON as an extension and enhancement to their own facility due to the excellent service, information, and cooperation they receive from Erie. While I understand that financial considerations are a large part of the recommendation to relocate the Erie facility, it is equally important to provide moral support in the form of local employment to service the airspace of the ground aviation assets. Based on the cost summary tables contained in the FAA National Facilities Realignment and Consolidations Report, Part 2 Recommendations, the O&M Total Cost of $474,850 for ERI compared to $480,562 are not significant to warrant the relocation. Specifically, the people who man the Erie TRACON are part of the local aviation and economic development*	Rep. John Patterson OH state legislature (99th district)

	community. The loss of their engagement is difficult to quantify, but is absolutely real. The Northeast Ohio/Western New York & Pennsylvania Region is facing difficult economic times due to the decline in manufacturing and the coal industry. The FAA could and should send a vote of confidence to both the men and women who work at the Erie TRACON for their service to the region by not relocating the facility. *Sincerely,* *John Patterson* *State Representative* *House District 99*	
22. 7/22/16	*I am an owner operator based at CAK and fly a CE525. I have over 5600 hours of flight time and fly throughout the continental U.S. for my business. CAK is an airport that supports commercial, GA and student/training flight operations. In my judgement regional airports are where the growth of our domestic airspace system will come from. My experience clearly indicates that to maintain safe operations at all times an airport with commercial operations mixed with general aviation operations clearly requires on site/local control. The risks are just too great. As a businessman I know firsthand that an activity that is closed and at some point requires a restart will in the future cost twice as much and require twice as long as the best laid plans project. Closing the TRACON at CAK is a shortsighted decision that potentially presents a compromise to safety not commensurate with any savings that are imagined. Do not close CAK flight control operations.*	Joseph Zeno Kent, OH
23. 7/22/16	*The Kent State University Aeronautics Program still maintains its position of being against the consolidation of Akron Canton's TRACON to the CLE facility. We prefer Akron Canton TRACON Radar Facility Modernization instead. Please consider the following. We understand that consolidation would provide the benefits of +ADSB, radar fusion, and the possibility of a 24 hour facility. But, to us, the following concerns about consolidation outweigh the benefits: Kent State University's Aeronautics Program is a growing program, with 250 flight students training to be professional pilots, flying 32 aircraft, and logging a total of 12,859.1 hours per year (2015 figures). A large percentage of that flight time utilizes the radar services provided by CAK. The established relationship we have with CAK controllers is an enormous benefit that will help us safely manage our growth. The controllers are familiar with our students, procedures, FOM/SOPs, practice areas, entry/departure corridors, training requests, and our operation in general. This environment and the familiarity with the controllers will aid in our students' successful performance as pilots in our national airspace system. In our experience the CAK controllers have provided the best service available, as compared to other facilities, and we do not want to lose this essential quality. Currently CLE and PIT have a lower traffic volume than in the past. If consolidation occurs and traffic increases at either airport (or both), we are concerned that the staffing levels may not be appropriate to handle the increased workload. Akron Canton controllers take pride in*	Ben Satyshur Stow, OH

their work and the airspace they control, and therefore, the quality of service they provide is greater than other facilities we use. We believe that pride will be lost if consolidated. Currently controller s have intimate knowledge of the airspace. Moving to a facility that covers a larger area (four airports) reduces airspace familiarity (fixes/airports/navaids/etc.). We have local controllers who meet face to face with our chief flight instructors annually to discuss operations. Additionally, we have had the CAK controllers meet with our Private Pilot and Instrument classes. We want to make sure these meetings continue. Surveillance approaches may disappear. Our training course outline (TCO) for the Instrument Pilot Flight course requires radar approaches per lessons I22 & I24. Additionally those pursuing their Certified Flight Instructor Instrument Airplane (CFIAI) certificate will need to practice radar approaches. We currently have the ability to receive IFR block altitudes for pattern A & B, or other instrument practice. I heard this will not be available if the TRACON is moved. Centrally locating the TRACON facility is putting "all your eggs in one basket." If there is a power outage, natural disaster, terrorist strike, fire, etc., a centrally located facility's impairment will affect a larger area and be a bigger problem. ARFF hours are currently 0500Z1000Z. We want to make sure any change will not affect their hours. We are concerned about possible increased spacing on IFR clearances and IFR approaches that can affect our operations. Our students are paying $100,000+ for their flight and collegiate education, and they do not need additional delays/costs. We like the quality of service now, and believe change needs justified. We hope you seriously consider these factors without letting cost trump the decision. We appreciate the opportunity to comment on this subject.