

# **Challenges and Recommendations for the AFTIL Tower Siting Process**

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**Prepared by the U.S. Contract Tower Association,  
an affiliated organization of the  
American Association of Airport Executives**

## **Introduction**

Since 1999, at least thirty three (33) new air traffic control towers have been constructed and entered the Federal Contract Tower (FCT) program. The growth of this very successful government/industry partnership affirms the confidence of the U.S. Contract Tower Association (USCTA), an affiliated organization of the American Association of Airport Executives, in the Federal Aviation Administration's (FAA) commitment to the air traffic safety, efficiency and cost-savings that this program affords airports nationwide. However, USCTA has concerns over the FAA's FCT site selection and design policies and is eager to work cooperatively with the FAA to resolve these matters for the benefit of all stakeholders.

USCTA has recently been made aware of practices that have hindered the development of these sponsor-owned air traffic facilities. The primary issues pertain to the administration of the following:

- ✍ FAA Order 6480.4 – Airport Traffic Control Tower Siting Process
- ✍ FAA-proposed design reviews of FCTs
- ✍ FAA facility security requirements.

## **Background**

USCTA members believe there are significant inconsistencies in the administration of the FCT site selection process. Consider the five (5) airports listed in the table below that have recently completed three (3) different site selection methods. All include the Airport Facilities Terminal Integration Laboratory (AFTIL), the alternative process or a combination of both.

Airport	Date Operational	Method(s)	Cost (Est.)	Time Elapsed
Easton (ESN), MD	10/2007	Alternative Process	\$20,000	6 months
Marana (AVQ), AZ	4/2009 (for siting study)	AFTIL	\$230,500	9 months
Conroe (CXO), TX	1/2009	AFTIL	\$30,000	18 months
State College (UNV), PA	3/2010	Alternative Process, <u>then</u> AFTIL	\$217,000	24 months
San Marcos (HYI), TX	11/2009	Alternative Process	\$37,000	6 months

University Park Airport (UNV) in State College, Pennsylvania, is a one runway airport serving both general aviation and scheduled passenger air service. The airport sponsor spent \$79,000 to complete the alternative process. However, after delays in review of the document submitted for the alternative process, the sponsor was advised to proceed with AFTIL, at an additional cost of \$138,000, in order to minimize further delays. The combined process took approximately 24 months, but is now under preliminary design.

San Marcos Municipal Airport (HYI) is a general aviation facility in central Texas with a complex three-runway layout, which was the first airport in the state to complete the alternative process. San Marcos also experienced some challenges in completing the required documentation and it took six (6) months to gain FAA approval. The study was done at a cost of roughly \$37,000 and the airport is now preparing to solicit bids for construction of their \$2,050,000 FCT.

In hopes of avoiding similar difficulties, Marana Regional Airport (AVQ), a general aviation reliever airport in southern Arizona, recently executed a reimbursable agreement with the FAA to complete the site selection process at a cost of \$230,500. AVQ expects to complete the study in April 2009.

Membership has also expressed concerns to USCTA about design reviews of FCTs. State College, PA has been provided a draft reimbursable agreement that would add approximately \$80,000 to the amount shown in the table for the FAA to review the consultant's design of the proposed FCT. Other airports have been advised that a reimbursable agreement would only include the FAA's expense of reviewing the portions of the design that pertain to FAA-owned equipment, but the scope of this draft agreement extends far beyond FAA-owned equipment.

USCTA has learned that sponsors are also having challenges in identifying what security standards apply to FCTs. FAA Order 1600.69B addresses blast protection and setback standards for FAA-owned air traffic facilities and FCTs, but it appears that the standards are only recommendations for FCTs. These factors directly impact the feasibility of proposed tower sites. Collin County Regional Airport (TKI) is a general aviation reliever airport 30 miles north of Dallas, Texas, that was advised by FAA staff to meet these standards after three months of investigation, but was more recently told that the requirements for any potential FCT site could be mitigated.

The consequences of these issues on the FCT development process include:

- 1) Increased site selection and design costs of a typical FCT by up to \$297,000;
- 2) Delays that have exposed airport sponsors to the inflationary environment of construction costs experienced in recent years;
- 3) Confusion over the documentation required to complete the alternative process, scope of FAA design reviews and facility security requirements, and
- 4) Reduced aviation safety by delaying the availability of critical air traffic control services.

With limited grant funds eligible for the development of FCTs that often times only cover 50 percent or less of total project costs, it is imperative that USCTA and the FAA work in partnership to resolve these matters as soon as possible.

## **Solution**

USCTA encourages the development of a comprehensive and uniform approach to the FCT development process. Without resolution, USCTA foresees that sponsors currently developing towers and the 25 airports identified for future FCTs will face similar challenges that could be detrimental to the continued success of the program. Below are several USCTA recommendations:

- 1) Clarify procedures in Chapter 9 of FAA Order 6480.4 that already states candidates are eligible to site FCTs using the alternative process and would only have to complete the standard process using the AFTIL if the documentation does not comply with the acceptable criteria.

If that concept is impracticable, revise current policies and consider implementing a process to evaluate each FCT project prior to beginning the site selection process in order to “pre-qualify” the project for the alternative process or AFTIL. USCTA believes that the majority, if not all, FCTs can be properly sited using the alternative process. Doing so would reduce the duration and cost of the site selection process and alleviate the burden these lower activity air traffic facilities place on the AFTIL. Additionally, reimbursable agreements with the FAA such as those used at Marana, AZ would significantly reduce FAA program costs;

- 2) Establish clear guidelines and a template for documentation required to complete the alternative process. This would help to clarify the FAA’s expectations so that consultants and sponsors would understand the scope of work required, further reduce the number of FCTs that might otherwise be directed to complete the AFTIL, reduce project costs and the time necessary to complete the site selection process;
- 3) Clarify FAA policies regarding design reviews and facility security requirements for sponsor-owned FCTs. USCTA concurs that the FAA must lead the design review and construction administration of FAA-owned equipment installed in FCTs, but does not support reimbursements for FAA design reviews of other portions of a FCT.

Furthermore, all stakeholders understand the importance of facility security, but USCTA believes that FC’s should be developed in accordance with current written directives outlined in FAA Order 1600.69B. The order recommends, but does not require, blast protection or setback standards for FC’s;

- 4) Streamline and standardize policies and procedures throughout each FAA service area in order to promote a consistent national program for the development of FCTs. Airport sponsors have observed variations in the administration of policies and procedures throughout each FAA service area. A comprehensive and uniform approach would benefit all stakeholders.

## **Conclusion**

The FCT program successfully provides more than 240 airports across the country with a high level of air traffic safety, efficiency and operational cost-savings in large part because of the efforts and support of the FAA. USCTA believes that resolving today's challenges related to the AFTIL process are critical to the continued success of the program.

USCTA suggests arranging a meeting either in Washington, D.C. or at the upcoming USCTA Policy Board Session, January 29 – 30, 2009, in Monterrey, CA to discuss these issues and potential solutions in more detail. Thank you for your time and consideration. We look forward to meeting with you in the near future.