Regarding FAA’s proposed rule to make the ADIZ Permanent…

“\textit{The truth shall set you free}”

Dear Secretary Chertoff, 
\textbf{…Or whoever is in charge…}\textbf{\textit{}}

I am the owner of the Potomac Airfield, that small general aviation airfield located \textit{between} Andrews AFB and the White House. I am also a private pilot approved by the Administration for operation within the most highly protected airspace in the world, the 15 mile FRZ surrounding Washington DC.

\textit{And all that implies…}\textit{\textbf{}}

Beyond our 15 mile inner FRZ lies a ‘jelly doughnut’ shaped airspace called the ADIZ. ‘Jelly doughnut’ because the ADIZ is so poorly designed that it spreads all over the place leaving a big sticky mess.

The FAA has a rulemaking that proposes making the ADIZ permanent; not because it’s a good idea (which it is not, not as it stands), not because it is effective security (which it is not), \textbf{\textit{but because without any real objectives, they don’t know what else to do, they just need to do something.}}

The optimist in me wants to believe FAA is using rulemaking to engage its public; to formally tell FAA to stop doing something so cumbersome and ineffective. The lesser optimist in me thinks that perhaps by changing from ‘ADIZ’ to ‘Special Flight Rules Area,’ the FAA opens a path to un-encumber itself and the public from the unrelated requirements of traditional ‘ADIZ’ airspace.

While I am confident FAA’s rulemaking will generate 20,000 ‘nays,’ I suspect they will all be over-ridden by one \textit{“Due to national security considerations…”}

Therefore, I address my public comments on the FAA rulemaking at a National Security level, hopefully laying crumbs toward rational behavior. \textit{Who knows, I might even get lucky.}

\textbf{BUILD ON SUCCESS! (\?) To evaluate the effectiveness of the ADIZ requires understanding the objectives of ‘airspace security.’ ‘Layered defense’ gets bandied about quite a bit; so (referencing publicly available information) let’s look at those various layers from the inside out.}\textbf{\textit{}}

\textbf{THE ONLY REAL DEFENSE IS…} At the very heart of this area are pre-positioned surface-to-air defenses in a point defense; the only real measures that have any chance of actually defending against any real air attack.

All these other measures merely sort targets to higher levels of confidence, and to steer away the innocent before they get blasted.

Of least concern are known Friends; next are unknown intruders responding to air-traffic guidance; then unknown intruders not responding to air-traffic, and worst of all, if unknowns \textit{evading} air interdiction. \textit{YIKES!}

Since air attack can come from anywhere at anytime, (\textit{most small aircraft don’t even need an ‘airport’ to takeoff}), the only ‘knowns’ are that an air attacker \textbf{\textit{must}} be airborne, and \textbf{\textit{approaching}} to be attacking anything.

Thus we detect possible hostiles by looking for unauthorized radar blips approaching the defended area.

The intruder might just be a lost farmer in a Cessna 152, which \textbf{\textit{also has to be dealt with proportionally.}}

If a radar blip is leaving the area, or merely passing at a distance, they cannot be attacking, \textbf{\textit{or, they are very bad at it.}}

\textit{“Hey, Mustafa, you’re going the wrong way!”}\textbf{\textit{}}

If they disregard escalating challenges and continue into the area, \textbf{\textit{then}} they get blasted to little bits.

\textbf{Very simple.}\textbf{\textit{}}

\textbf{TARGET SORTING} The ‘threat’ has never been the innocent pilot, nor their inanimate aircraft. \textbf{\textit{Only regulators continue to mistake ‘regulation’ and ‘enforcement’ over those willing to comply, for ‘security’ against those who don’t care what they say.}}
The the real problem has always been to provide means for those with their fingers on the trigger, to tell apart ‘friendly,’ ‘unknown,’ and ‘hostile’ radar blips.

**SO THE FRZ SORTS TARGETS**

Civil aircraft radar blips are basically indistinguishable, so we give specific characteristics to the radar blips of aircraft under the control of pilots who we know in advance are not a threat.

In general terms, to obtain FRZ authorization, pilots voluntarily pre-qualify; the objectives of the process include denying authorization to pilots who cannot navigate out of a paper bag, and more importantly, to discourage anyone trained in Afghanistan by the Taliban.

Well-meaning bureaucrats, not having access to anything meaningful, meticulously review the meaningless, vainly searching to find some meaning that isn’t there. *But I digress...*

FRZ pre-approved pilots are then given ‘safe passage procedures’ that convey pilot identification and control, which make their particular radar blips quickly obvious as known Friends.

The guys on the triggers know not to shoot down the GREEN radar blips. *Objective achieved.*

In the FRZ we pass security information between agencies using pieces of the pre-existing air-traffic system; by using ‘flight plans’ that are not flight plans, and ‘air-traffic procedures’ that are not air-traffic procedures. *So what’s so confusing about that?*

**THE ADIZ IS BORN** - When condition ‘orange’ first occurred, many well-meaning government agencies were driven to hysterics, not knowing what to do, but compelled to do something.

TSA stepped into the still untied shoes of the FAA, neither of them really understanding what they’d been given with the FRZ. Not only did both FAA and TSA fumble the ball, *they also tripped over it and then popped it.*

In fact, when the orange ball went up, the security agencies wanted and expected the FRZ ‘paradigm’ to expand to 30 miles; in order to sterilize more airspace of unknown radar blips, leaving only pre-approved ‘Friendly’ radar blips going about their regular business normally.

After all, the FRZ was intended as the high-threat airspace model for sorting airborne targets, to keep the innocent from getting blasted to little bits, anticipating reprisals entering the war with Iraq (AHEM).

The regulators, fearful of imposing so draconian a measure on so many, fervently remaining clueless what the FRZ was for, copied only the FRZ’s surface effects into the ADIZ; “flightplans” and “air-traffic;” *entirely mistaking the process they thought they saw, for the objective they failed to understand.*

The airspace for the ADIZ never had anything to do with security requirements; merely what FAA legal staff could describe as already printed on maps. *A navigable circle would be much simpler, and might stop flushing the White House quite so often.*

Making the ADIZ half-pregnant created the current situation where no one has been willing to admit that the ADIZ does nothing for security, for fear of what ‘They’ will come up with next. *Until now...*

**REVIEW** – This will be on the test!

- **Layer 1**: Circle of Doom - Unauthorized airborne intruders blasted to little bits.
- **Layer 2**: FRZ – Pre-approved pilots use ‘special procedures’ to convey, through the radar jockeys, to those who watch over them, the pilot’s identity (authorization) and control; thus able to operate normally.
- **Layer 3**: ADIZ - A buffer around the FRZ in which harmless errant intruders can be harmlessly vectored away. If they are talking to air-traffic, *yell at them; if not talking to air-traffic, intercept and then steer them away.*

**SO WHO GETS ALL THIS STUFF?** The only place the Federal government is going to implement these procedures is where an attack could interfere with the functioning of the Federal government (except for when the government attacks itself!).

These measures are breathtakingly expensive, on many levels, so your local shopping mall isn’t even on the waiting list, and never will be.

**NOW WHAT?** Well-meaning bureaucrats keep interfering with things they don’t understand in the FRZ, while the ADIZ serves no real purpose. *So now what to do?*

Now that you’ve been given the objectives, it should be apparent that there are *much smarter and much easier* ways to achieve them.

Since the primary purpose of the airspace is (now) to keep the innocent from coming to harm, all you need to do is make sure the pilots of nearby radar blips are monitoring air-traffic control, and will obey instructions that keep them from coming to harm.

If controllers need to tag a radar target with a squawk, to keep straight which radar blips they’re talking to, then let them issue a squawk, *but nothing more.*

If ‘the balloon goes up’ They will really need a 30 mile FRZ, to spot unauthorized movements earlier, and to intercept the confused. So let’s do something effective *instead,* but *only*:

1. During a declared ‘national security emergency,’ and,
2. Under the clear authority and responsibility of the only ones who *can* declare a national security emergency, and because of who they work for.

The FRZ was supposed to be the high-threat contingency model. You don’t put out fires by spraying your fire-extinguisher where you think fire might occur; you make sure it works, and then you keep it handy in case you have a real emergency.

‘Nuff said. *Sit back, enjoy the show, and let’s see what happens next!*

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