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

“The truth shall set you free”

Dear Secretary Chertoff,

...Or whoever is in charge...

I am the owner of the Potomac Airfield, that small general aviation airfield located *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.

And all that implies...

Prior Executive Office Decisions, to re-open the airspace to properly vetted pilots, have been inadvertently undermined by a fistful of well-meaning agencies creating a befuddling sticky mess out of something simple.

**REVIEW OF WHAT WE HAVE**

There are various ‘layers’ of airspace defense surrounding Washington DC. Reviewing these layers from the inside out, using publicly available information:

*Layer 1. Within the City Limits: 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 measures beyond these inner defenses are to have higher levels of confidence in the pilot at the controls, and to veer away the innocent before they come to harm, *nothing more.*

*Layer 2. The 15 Mile Inner FRZ: Within 15 miles, in general terms, to obtain FRZ authorization pilots apply for review, the objectives of the review process include denying authorization to any pilots unable to navigate their way out of a paper bag; and more importantly, to discourage anyone trained in Afghanistan by the Taliban.*

Well-meaning bureaucrats, without access to meaningful information, meticulously review the meaningless, vainly searching to find, or impose, meaning that isn’t there. *But I digress…*

Once approved, pilots use ‘special procedures’ prior to entry and within FRZ airspace, which convey pilot identity and aircraft control through air-traffic control, to those who watch over their shoulders.

We use ‘flightplans’ which aren't flightplans, and ‘air-traffic procedures’ which aren’t air traffic procedures, to coordinate security information between agencies, that keeps our customer base from being shot out of the sky.

What’s so confusing about that?

Known as ‘safe passage procedures’ these are techniques similar to those used to keep from shooting down our own fighters returning to an airbase.

*Layer 3. The 30 Mile Outer ‘ADIZ’: Beyond the 15 mile FRZ is an outer ‘jelly doughnut’ of airspace called the ADIZ. ‘Jelly doughnut’ because the ADIZ is so poorly designed that it spreads in all directions, leaving a big sticky mess.*

In the ADIZ thousands of pilots are forced to use flightplans which *are* flightplans, and air-traffic procedures which *are* air-traffic procedures, to coordinate... *nothing meaningful, with nobody who really cares.*

Other than getting every pilot in contact with air-traffic, able to be veered away from protected airspace *if they are inclined* to cooperate; and other than creating overwhelming, saturating workload for everybody, controllers and pilots alike, the ADIZ serves no real purpose.

*POTOMAC AIRFIELD NEWS*

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*PROPOSED FAA RULEMAKING* (Docket 17005) would make the ADIZ permanent; not because it’s a good idea (which it is not, not as it stands), not because it offers effective security (which it does not), but because without alternatives, they simply don't know what else to do, they just need to do something.

*What It Might Be -* 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.

*What It Could Be -* The lesser optimist in me thinks that perhaps by changing the terms from ‘ADIZ’ to ‘Special Flight Rules Area,’ the FAA begins to uncumber itself from the unrelated requirements of ‘ADIZ’ airspace.

*What It Probably Will Become - While I am confident FAA’s rulemaking will generate 20,000 ‘nays’ from aviation groups, I suspect they will all be over-ridden by one quiet “Due to national security considerations…” Therefore, these are my public comments on FAA’s proposed rulemaking, at a National Security level, hopefully laying some useful crumbs toward mutually rational behavior.*

*Who knows, I might get lucky.*

**FUNDAMENTAL REALITIES:** The only reason to use any aircraft to attack anything is because only an aircraft can over-fly all surface security and defensive measures.

...Which should make obvious that forever trying to expand two-dimensional efforts on the surface, at a few irrelevant locations, can never address this three-dimensional concern.

A rental truck is less visible, has far more payload, and you can *even get your deposit back.*
Since air attack can come from anywhere at anytime (most small aircraft don’t even need any ‘airport’ to takeoff, any grass field or country lane will do just fine), the only ‘knowns’ left are that an air attacker must be airborne, and must be approaching to attack. ‘Targets of interest’ are therefore any unauthorized airborne radar blips approaching the defended area.

Of course, an ‘intruder’ may just be a lost farmer in a Cessna 152, a situation which must be dealt with proportionally, so you don’t empty the city over nothing, and you don’t just shoot him down for getting lost, which would be even more embarrassing and silly.

If a radar blip is leaving the area, or merely passing by at a distance, they cannot be attacking, or, they are very bad at it.

"Hey, Mustafa, you’re going the wrong way!"

If the intruder disregards escalating challenges and continues into the area, then they get blasted to little bits.

Understood correctly, it’s simple.

IT’S ALL FOR TARGET SORTING
The ‘threat’ has never been the innocent pilot or their entirely inanimate aircraft; the problem has always been to provide reliable radar blips, leaving only did FAA and TSA both fumble for what craziness ‘They’ will come up next.

Hey FAA, ever heard of GPS? How about electronic navigation referenced off of an electronic navaid? It’s the latest thing.

Navigable circle around a navigable reference would be much simpler for everyone, and it might also stop flushing the White House quite so often.

!!THE KING HAS NO CLOTHES!!!
By making the ADIZ half-pregnant the current situation was created:
No one dare admit that the ADIZ does nothing for security, out of fear for what craziness ‘They’ will come up with next.

Until now...

WHERE ONLY IS AIR DEFENSE JUSTIFIED? 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, such as when it creates panic over nothing).
These measures are breathtakingly expensive, on many levels, so your local shopping mall isn’t even on the waiting list, nor will it ever be.

NEXT STEPS? These objectives explained should make apparent that there are much smarter ways to achieve these objectives, instead of blindly continuing to do more of the same.

Public Safety. Since the primary purpose of the airspace is (now) to keep the innocent from coming to harm, one need only make sure that pilots nearby the protected area are monitoring air-traffic control, and will listen and obey to instructions given to them, to keep them from coming to harm; not ‘administrative action,’ not ‘enforcement,’ just say things like ‘Turn left, NOW, I mean it…’

Target Coordination - If in the area controllers need to tag radar targets with a transponder squawk, to keep straight which radar blips they’re talking to and which ones they’re not, then let them issue a squawk, but nothing more; no needless workload.

If the Orange Balloon Goes Up - If ‘the balloon does go up’ they will need a 30 mile FRZ, or more, in order to spot unauthorized movements earlier, and to intercept the confused.

Instead of mindlessly continuing dysfunctional half-measures for lack of options, why not replace them with something workable:

1) Use the FRZ to protect the functioning of the US government.
2) Recognize and implement workable FRZ procedures that verify an approved pilot is in control of their aircraft.
3) Let the powers that know who they are, temporarily declare an FRZ to thirty miles, or more, at their discretion, but only under escalating conditions,
4) Establish clear lines of authority and responsibility for the management of any real crisis,
5) All the while, allow approved legitimate users normal use in the FRZ as known friendlies, as they are not a threat.

The FRZ was supposed to be the high-threat contingency model. You don’t put out fires by spraying your fire-extinguisher everywhere you think fire might occur; you make sure it works, and then you keep it handy, on the shelf behind glass, 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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For a good time, see more at www.POTOMAC-ARFIELD.com