

February 6, 2015

The Honorable Michael P. Huerta Administrator, Federal Aviation Administration 800 Independence Avenue, SW Washington, DC 20591

Dear Administrator Huerta:

We write to express our appreciation for the fact- and science-based approach FAA takes in addressing aircraft noise and for your resolve in staying the course. Airlines, other aircraft operators, airframe and aircraft engine manufacturers, and FAA have dramatically reduced the number of people exposed to aircraft noise. Even so, we understand that concerns remain and may be heightened when changes in air traffic procedures, such as those occasioned by the transition to the Next Generation Air Transportation System (NextGen), are introduced. It is critical to NextGen implementation that FAA continue to employ science-based noise metrics and thresholds in assessing policy responses to those concerns.

We recognize the importance of continuing to address aircraft noise. With a strong track record of deploying new, quieter technology and the implementation of noise abatement operational procedures, our members have played an important role in reducing noise exposure. Indeed, the number of people exposed to significant levels of aircraft noise in the United States has dropped by 95 percent since the late 1970s, even as enplanements have tripled. And reduction of noise at the aircraft source is expected to continue, with the International Civil Aviation Organization (ICAO) adoption of more stringent "Chapter 14" aircraft noise standards.

Against this backdrop, we are troubled by recent calls for FAA to fiat in new noise metrics and thresholds without basis or to otherwise reverse appropriately adopted advanced Performance-Based Navigation (PBN) flight procedures, such as those recently deployed at Phoenix Sky Harbor International Airport. The Aviation Safety and Noise Abatement Act of 1979 (ASNA) established a science-based approach to assessing and addressing noise exposure. This makes sense. While appreciating that any particular person experiencing aircraft sound may have a negative experience, the National Airspace System (NAS) cannot function on a non-scientific or case-by-case basis. The Day-Night Average Sound Level (DNL), 65 decibel (dB) threshold and noise assessment procedures established consistent with ASNA appropriately map the subjective experience of noise into a system that can be applied on an objective basis.

Our associations and members support a business-case-based approach to NextGen implementation. Tangible, near-term improvements in schedule reliability, customer satisfaction, noise management and fuel burn and emissions reductions can be achieved if the FAA delivers on needed policies, procedures and training. Critical to this is FAA's objective application of well-established noise metrics and policy. Documented science to date supports the DNL 65 dB and FAA noise screening and assessment

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approaches. We understand that FAA is conducting a comprehensive, multi-year noise research project, commonly known as the "noise research roadmap," that is, among other things, reviewing the federal regulatory approach to noise measurement and action thresholds. This scientific and data-driven process should be allowed to proceed to ensure that any potential changes to U.S. noise metrics and policy receive proper consideration. Accordingly, we strongly support FAA's resolve and your personal engagement to continue to stay the course on this process.

Thank you for your consideration.

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