



U.S. Department
of Transportation
**Federal Aviation
Administration**

Great Lakes Region
Illinois, Indiana, Michigan,
Minnesota, North Dakota,
Ohio, South Dakota,
Wisconsin

Chicago Airports District Office
2300 East Devon Avenue, Suite 201
Des Plaines, Illinois 60018

February 6, 2017

Mr. Aaron Frame
Deputy Commissioner
Chicago Department of Aviation
10510 W. Zemke Road
PO BOX 66142
Chicago, IL 60666

Dear Mr. Frame:

Thank you for your January 9, 2017 email requesting comments from the Federal Aviation Administration (FAA) on the City of Chicago Department of Aviation's Fly Quiet II Rotation Test from July 6 through December 25, 2016. As you are aware, the FAA O'Hare Air Traffic Control Tower provided comments on the test through November 29, 2016. Those comments are incorporated below with clarifications, in addition to comments by other FAA lines of business, to provide the full range of our comments.

The FAA's comments on the test that ended on December 25, 2016 are:

- Improve coordination with the FAA's Technical Operations staff to mitigate the impact of the rotation on planned and unplanned FAA equipment maintenance and flight check operations.
- Improve coordination of planned and unplanned City of Chicago airfield construction to better understand, in advance, the impact of the construction on the proposed rotation schedule.
- The O'Hare Air Traffic Control Tower Local Safety Council made the following recommendations:
 - *No official configuration should allow for crossing of an active arrival runway in order to taxi to the designated departure runway.* The FAA's safety culture, focusing on the safety of passengers and crew on all flights, has altered operating

procedures to limit active runway crossings in front of arrivals and/or departures to the absolute minimum at all times.

This is applicable to Configuration E in the Fly Quiet II Runway Rotation Test. Aircraft departing on Runway 10C must cross active arrival Runway 10L to taxi to their departure point. This is a condition that is not allowed during daytime operations and it should not occur during the night.

- ***A long runway should be kept available on stand-by for quick access, should the longer runway be required by an arriving or departing aircraft.*** The process for requesting a longer runway, on nights that a longer runway is not the designated primary runway, was not consistently followed during the six-month test period. The number of long runway requests by both aircrew and adjacent air traffic facilities was higher than expected. This led to significant additional coordination by air traffic controllers and CDA operations staff. This is a scenario that could cause confusion and introduce safety risks. FAA suggests additional efforts are made to strengthen the longer runway request process, to ensure all involved parties understand and follow the process.

This is applicable to Configurations D, G, and I in the Fly Quiet II Runway Rotation Test.

- ***Runway 9R should not be used as an arrival runway.*** Due to the overflights by Runway 9R arrivals of taxiing aircraft on Taxiway T and/or Runway 33, O'Hare has instituted a Corrective Action Plan (CAP) to mitigate this issue. O'Hare Control Tower procedures mandate a separate position be opened and staffed to solely work taxiing traffic on Taxiway T and/or Runway 33 while landing Runway 9R. The staffing on the midnight shift is not sufficient to open the additional position that is required to mitigate the safety concern.

This is applicable to Configuration C in the Fly Quiet II Runway Rotation Test. At night, aircraft frequently taxi on Taxiway Tango and/or Runway 33 for maintenance in the north airfield, taxiing beneath the final approach path to active Runway 9R.

- ***Opposite Direction Operations (ODO) should only be used when approved by ORD ATCT.*** Current FAA rules contain required procedures for conducting ODO. These procedures are in place to ensure the safety of ODO, and only air traffic control can determine if these procedures can be followed and, consequently, if ODO can be used. FAA understands that ODO was not planned during any of the configurations in the Fly Quiet II rotation test; however, configuration "G", landing Runway 22R and departing Runway 33 without the availability of Runways 10L/28R or 10C/28C created multiple requests from

inbound aircraft to arrive on Runway 15 while departing Runway 33. This created an ODO situation, which is a safety concern. FAA suggests that an option to prevent this occurrence is to change the secondary option for “G” to an option that enables arrivals on Runway 10L/28R or Runway 10C/28C.

- The O’Hare Air Traffic Control Tower Local Safety Council also has this additional comment for consideration:
 - Arrivals to one runway and departures from another runway that do not converge or intersect (Configurations D, F, H, and I) introduce less risk to the O’Hare system than arriving and departing on the same runway surface (Configurations A, B, F, and J).

Please let us know if you would like to discuss any of these comments and recommendations. We would like to request a copy of the results documentation that you generate for the Test, as you indicated in your June 2016 request to the Federal Aviation Administration to conduct the Test. Any future requests for additional tests or a longer term rotation will have to be evaluated through NEPA documentation, prior to implementation, as was the 2016 Fly Quiet II Rotation Test.”

Sincerely,



Barry D. Cooper
Federal Aviation Administration
Great Lakes Region
Regional Administrator