

Dear Mr. Thurgur

It was great to see the public announcement last week.

I would like to comment on the Operational Response to my letter of January 19, 2015, incorrectly identified as being from 2016. It has taken 15 months to receive a response to my correspondence... not the 3 months which is implied.

Of course, in the interim, I have been educated further on both sides of the equation. So, my evaluation has been subject to further clarity on my part, having been part of this process for only 4 months at that juncture. This further clarity makes me believe that my suggestions are valid, subject to some adjustment, of course. Nothing is perfect at first cut.

I will deal with the technical points of my arguments during the study, but I would like to address one statement in the Operational Response that caught my attention. On Page 3. "As an overarching objective, airspace change must not in any way reduce the level of safety in the system". This statement, if applied literally, means that even adding a single additional aircraft to the arrival pattern would not be allowed as this, in a very small way, would "reduce the level of safety in the system".

When evaluating aviation safety, there are many suitable goalposts that can be used to determine if a procedure or change meets the standard. Some of these are listed in the Operational Response below the statement objected to, but the statement itself is too overarching to provide valid guidance to the process. Frankly, it could be interpreted as an opportunity to retain subjective privilege to defend the status quo or, at the very least, retain subjective veto or control over any recommendations or even preempting the process of defining the Terms of Reference for the third party study.

I have some concern about the implications of the primary stakeholder engaging the third party. We all know that we take studies with a grain of salt when they benefit or support the views of the company, organization or political party that sponsors the study. It would seem that the third party should be engaged by a neutral external entity... perhaps the government. At the very least, this would protect Nav Canada from criticism if it is found that CYYZ airspace is perfectly managed or limited change results. Without some separation, TANG, RANGO and others might simply dismiss the findings as “bought”. Certainly, if TANG had hired an external company to do similar analysis, I would expect Nav Canada would dismiss the findings, just as they have dismissed my views.

It also leads me to a similar concern of how, and by whom, the Terms of Reference for the study will be defined. If the ToR will be defined by the authors of the “overarching” statement, this is certainly a valid concern. Until now, the current airspace has been designed, defended and implemented by a small group of individuals. Those same individuals have provided questionable responses over the years to groups concerned about the design and their impact on the community. Finally, those same individuals set the terms of reference for the roundtables, selected the 6 options presented (some unnecessarily complex), are responsible for studying and implementing them and are the same people who have not yet implemented even the simplest of the proposals that were tabled last summer. I must assume this small group is also responsible for the Operational Response document.

It would be inappropriate to develop the Terms of Reference of the study in another vacuum, especially with Nav Canada writing the cheque. I can

understand why Nav Canada designers support procedures which they designed and fully support their right to explain the rationale for those procedures during the study. But, without the proper Terms of Reference, the time and money spent on this study will be wasted and the study itself will have little support from the groups it is meant to appease, nor will it lead to any effective change. I encourage Nav Canada to include external stakeholders in the development of the Terms of Reference.

To address a couple of items in the Operational Response, without going into great detail, my recommendation for modifying the arrival tracks to allow continuous departure climbs exceeds ICAO design climb standards and would, in practice, have aircraft separated by 3,000 to 5,000 ft and diverging in altitude while still at ICAO lateral separation rather than converging to the minimum altitude separation standard right at the exact point of intersection. All this while saving airlines \$40 million per year, saving 2 minutes per affected inbound AND outbound flight and reducing ghg emissions by millions of kilograms while substantially reducing low altitude overflight of residential areas in all quadrants of CYYZ.

Further, despite being characterized in the Response as an "undesired flow management technique", holding is a useful tool to safely manage inbound arrival rates used around the world. Certainly, enroute management is a more desirable option, and I would encourage Nav Canada to employ this technique, but holding, once aircraft are proximal, does not cause further delays. It is certainly a better option than sending transport aircraft so far downwind that they may interact with uncontrolled, non-radar, general aviation aircraft at low altitude caused by unnecessary anchor point altitudes. Not to mention the unnecessary noise this creates, of course.

I look forward to participating in this process with Nav Canada. My biggest frustration to date has not been the simple fact that the CYYZ STARs are of less than perfect design. It is that, in the face of clear and valid argument, Nav Canada, to date, has been unwilling to consider alternatives. Despite this frustration, I do enjoy meeting and engaging with your staff at Nav Canada. I sense a new desire, at the executive level, to change the way that Nav Canada engages all stakeholders. It is my great hope that this is a precursor to a new era in considering all stakeholders at the design and operational levels while maintaining or improving safety and efficiency.

Regards

Dave Inch