

April 3, 2023

Captain Billy Nolen  
Acting Administrator  
Federal Aviation Administration  
800 Independence Ave SW  
Washington, DC 20591

Re: Leesburg Executive Airport (JYO) Remote Tower

Dear Captain Nolen:

On behalf of the National Business Aviation Association (NBAA) and its more than 11,000 member companies utilizing business aviation aircraft, we want to express our concerns with the recent decision to cease remote tower operations at Leesburg Executive Airport (JYO) in Leesburg, VA. We believe it is in the interest of safety to continue this innovative and cost-effective capability. We encourage the Federal Aviation Administration (FAA) to continue working with the City of Leesburg to explore alternatives that will allow for the same level of enhanced safety the remote tower has offered and believe that any change should be based on a full Safety Risk Management assessment.

Over the past eight years, the industry has seen the safety and cost benefits of the prototyped remote tower program at JYO. NBAA has been an active participant in the multiple safety risk assessments that have been completed during the phased remote tower deployment and no safety issues have been identified, rather the remote tower program has only enhanced safety. Our members have benefited from the safety enhancements for both local and itinerant operators.

On the heels of the recent FAA Safety Summit, recent FAA Safety Alerts for Operators (SAFO), and InFO Share, we urge the agency not to allow a quest for perfection to hinder the incredible innovation and safety enhancements that technology like the remote tower at JYO has and will continue to deliver. In the FAA's own operational viability decision issued in September 2021, the agency decided to continue forward with the services offered by the Saab remote tower system, and even discontinued the use of a temporary tower backup system because of that review.

It is concerning that over a dozen safety assessments, an operational viability decision and years of operational experience, as well as robust investments by the FAA and industry are being discarded and services will come to an end on the cusp of a busy summer travel season. The complexities of the Washington, DC airspace and the mix of operations at JYO are not trivial and must be considered before the remote tower services end. We respectfully ask the agency to convene a Safety Risk Management panel that includes industry and local operators. We also ask the agency to explore alternatives with Leesburg and allow the remote tower services at JYO to continue until a viable replacement or plan has been developed.

NBAA understands the need for ensuring new technologies deliver safe and effective capabilities as they are introduced into the National Airspace System. The JYO remote tower has been an example of adding an additional, proven layer of safety that has become accepted and relied upon by the operators. NBAA urges the agency to take additional steps to ensure we don't remove that layer without the necessary due diligence and collaboration with the airport sponsor and aircraft operators.

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Bolen", with a horizontal line extending from the end of the signature.

Ed Bolen

Cc: Paul Fontaine, Assistant Administrator for NextGen