



September 5, 2013

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Re: Comments on Discussion Paper 05: Aviation Noise

To Whom It May Concern:

Airlines for America<sup>®</sup> (A4A) appreciates this opportunity to comment on the Airport Commission's Discussion Paper 05, on aircraft noise. A4A is the principal trade and service organization of the U.S. airline industry, and its member airlines and their affiliates transport more than 90 percent of all U.S. airline passenger and cargo traffic.<sup>1</sup> We would like to emphasize from the outset that A4A and our member airlines 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, airlines have played an important role in reducing noise exposure. Statistics from the Federal Aviation Administration (FAA) confirm that 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. As our member airlines have integrated newer and ever quieter aircraft into their flights, they have contributed to similar reductions in aircraft noise in international operations, including in the United Kingdom (UK). It is from this vantage point that we respond to the consultation.

As a general matter, A4A would like to commend the Airport Commission on the work it did to pull the Discussion Paper together. The document provides a very good, big-picture overview of the issue of noise exposure in general and of the specific metrics, noise abatement measures and exposure issues attendant to aircraft noise. As A4A represents aircraft operators, we focus our comments primarily on the noise "mitigation" issues in Chapter 5 of the consultation. However, we first provide a few observations on the noise metric and assessment issues.

#### Noise Metric and Assessment Issues

As noted in the Discussion Paper, significant work has gone into the development of the current noise metrics in the UK, marrying sound levels with dose-response. While the UK has a slightly different weighting approach than that used in the United States (as illustrated in Table 3.3), the underlying approaches and use of noise contours to reflect the number of people in the vicinity of an airport affected by noise are substantially similar, and consistent with guidance from the International Civil Aviation Organization (ICAO), the United Nations body charged with setting standards and recommended practices for international aviation. Having well-documented, accepted and objective noise metrics is critical to ensuring that policy decisions are rational and

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<sup>1</sup> A4A's members are: Alaska Airlines, Inc., American Airlines, Inc., Atlas Air, Inc., Delta Air Lines, Inc., Federal Express Corporation, Hawaiian Airlines, JetBlue Airways Corp., Southwest Airlines Co., United Continental Holdings, Inc., UPS Airlines, US Airways, Inc.; Air Canada, Inc. is an associate member.

based on sound science. Accordingly, A4A respects and supports ongoing research to confirm the existing metrics for noise impacts and/or aid in the consideration of potential revisions to the metrics. In this regard, the United States FAA is engaging in a multi-year process to undertake and gather research of aircraft noise effects and dose-response. In the paper it presented to the 9<sup>th</sup> meeting of ICAO's Committee on Aviation Environmental Protection (CAEP) in February 2013, the FAA outlined this work and noted its interest in collaborating with other countries on it. We urge the UK to collaborate with the FAA in this work. To be accepted, any potential changes to the metrics should not be made lightly or in isolation.

#### Noise Mitigation – Comments on Chapter 5 of the Discussion Paper

Below A4A provides comments on specific points in Chapter 5 and related questions that appear in Chapter 6 of the Discussion Paper.

- Paragraph 5.2 – A4A calls specific attention to and supports the finding of Sustainable Aviation that noise from aviation in the UK will not increase despite expected increases in air traffic. As noted above, aviation has a strong record of reducing aircraft noise exposure, even as demand for air transportation has expanded. Coupled with the industry's ongoing commitment to an array of noise mitigation measures, the recommendation by ICAO's CAEP for the adoption of a new noise certification standard for future aircraft, the "Chapter 14" standard, will help ensure that this trend continues.
- Paragraphs 5.4 and 5.5 – A4A greatly appreciates and strongly supports the UK's recognition (as expressly reflected in the Aviation Policy Framework (APF)) of the ICAO Balanced Approach to Noise. This policy, which encompasses the four elements noted in the Discussion Paper, recognizes that aircraft noise from international airline operations can have State-specific and local impacts such that noise analysis and consideration of mitigation measures should take place at those levels. However, having and adhering to this internationally-agreed approach to aircraft noise management is critical to ensuring that airlines can fly from country to country without inappropriate or unsubstantiated restrictions and that the full array of noise mitigation options is given due consideration.
- Paragraph 5.6 – A4A agrees with the statement in the Discussion Paper that the noise certification standards process ensures that the latest available noise reduction technology is incorporated into aircraft design. Notably, technology-based breakthroughs in noise reduction at source by far have been the largest contributors to aircraft noise reduction. Yet we could not disagree more with the apparent support in the Discussion Paper for certification standards to be used as a basis "to enable airports to incentivize take-up of aircraft with the latest available noise reduction technology" through noise charges or other penalties.

The ICAO noise standards are not intended to introduce operating restrictions – of which noise-based landing fees are one type – on aircraft. On the contrary, the standards are focused on ensuring that aircraft, as manufactured, incorporate technologies that achieve the desired level of noise minimization. Considering the international nature of air transport and the long lifespan of aircraft, operators must have the assurance that aircraft certified in accordance with all applicable international standards can be operated worldwide during their entire lifespan and without undue restrictions that hamper international air transport.

Further, landing fees and penalties are not a cost-effective way to reduce noise. The complicated route networks operated by airlines do not allow them to send only the quietest of the quiet aircraft to a particular airport. In any event, to the extent that any

such fees are to be considered, they must adhere to the Balanced Approach and ICAO policies on charges. See “Guidance on the Balanced Approach to Aircraft Noise Management” (Doc 9829) and “ICAO’s Policies on Charges for Airports and Air Navigation Services” (Doc 9082). Among other things, noise fees are to be levied only when found to be appropriate to help address an objectively quantified noise problem. Further, they are required to be “cost-based,” meaning the charges must be designed to recover no more than the costs of the noise mitigation measure they will fund. Thus, the Airports Commission should not be promoting the use of noise charges as means of trying to further push airlines to preferentially deploy particular aircraft at particular airports and any discussion of such charges should note the applicability of the Balanced Approach and ICAO policies on charges.

- Paragraphs 5.13-5.15: While A4A appreciates the mention of land use planning in the Discussion Paper, we believe this noise management technique should be given more attention, both in the Paper and in UK aviation noise policy. Land use planning can greatly reduce noise in a cost-effective manner. Through CAEP, ICAO continues to tackle this very issue. CAEP has produced a number of relevant guidance materials, including ICAO Document 9184, “Airport Planning Manual.” It is important to consider that land use planning policies must prevent future development policies from creating additional noise problems, including when airlines have already reduced noise exposure. Studies have shown that population tends to increase near airports at a higher rate than other areas in metropolitan regions, indicating a need for appropriate zoning policies to prevent residential units from being built in particularly noise-prone areas.<sup>2</sup> This has proven such a concern that ICAO has developed an Encroachment Appendix to the ICAO Doc 9829 covering the Balanced Approach.<sup>3</sup> The ICAO work notes that population encroachment has occurred around airports due to poor land use planning decisions, even while airlines have worked to reduce noise from the source. In light of the above, we urge the Airports Commission to focus more attention in this area. Accordingly, we commend the Commission to the “Land Use Planning Opportunities” section of the “Sustainable Aviation Noise Road-Map”<sup>4</sup> for actionable recommendations the UK should consider pursuing.
- Paragraph 5.17 and the related question in Paragraph 6.2 (bullet point #7): The Discussion Paper appropriately identifies the issue of noise “concentration” and “dispersal,” which can be occasioned by and reflect the precision of flight tracks. Notably, although concentration is appropriate in many cases, and A4A supports the UK policy making this the predominant approach, no one-size-fits-all policy works in this regard, as the approach that works best in a particular area will vary. For example, at airports with significant volume of flight activity, noise concentration allows for cost effective mitigation measures and focused land use planning initiatives in targeted areas. Concentration also can have the benefit of enhancing airspace capacity because the air traffic service provider does not have to periodically reconfigure the departure and arrival flows. (In practice that reconfiguration causes lost capacity during the transition from one

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<sup>2</sup> Partnership for Air Transportation and Emissions Reduction (PARTNER), “Land Use Management and Airport Controls: Trends and indicators of incompatible land use.” December 2007. <http://web.mit.edu/aeroastro/partner/reports/landmgt-proj6-2008-01.pdf>

<sup>3</sup> ICAO Committee on Aviation Environmental Protection Eighth Meeting (CAEP/8), “Working Paper 38: Updates on the Balanced Approach Guidance Document.” 1 – 12 February 2010.

<sup>4</sup> See “The Sustainable Aviation Noise Road-Map: A Blueprint for Managing Noise from Aviation Sources to 2050,” at Chapter 5.

configuration to another.) However, dispersal may be appropriate at airports with modest flight activity levels, which will not be able to take advantage of the mitigation, land use and through-put opportunities that concentration can bring.

- Paragraph 5.22: As the Discussion Paper points out, people's response to noise – including aircraft noise – is highly subjective. While there always will be unique responses from individuals, studies show that strong community engagement programs that provide resources for the public to get the facts on aircraft noise can have a very positive impact in terms of community response. In response to the Airports Commission's request for positive examples of community engagement, we recommend that the Commission study the noise education and outreach program at Dallas-Fort Worth Airport (DFW) in the United States.<sup>5</sup> Also, the Sustainable Aviation Noise Road-Map has a very helpful set of materials on this issue.
- Comments on Operational Restrictions, Paragraphs 5.23 through 5.35: A4A concurs with the statement in Paragraph 5.32 of the Discussion Paper that noise restrictions can be "detrimental to an airport's operation, limiting capacity, connectivity and efficient operation." While the Discussion Paper appears to focus mostly on airport-specific effects, restrictions greatly harm airlines, thereby impacting local, regional, and international economies. More than 750,000 scheduled international flights depart the UK annually, headed for almost 400 airports in 114 countries.<sup>6</sup> It is clear that aviation has important economic value not just for the UK but for the entire world. Thus, it is critical that the internationally-agreed approach to aircraft noise management – the Balanced Approach to Noise -- be followed when potential restrictions are considered. As noted in the Discussion Paper, the Balanced Approach makes clear that operating restrictions should not be employed as a first resort but, rather, should be considered only after the other three elements of the Balanced Approach are considered.

In Paragraphs 5.33 and 5.34, the Airports Commission notes the potential for "noise envelopes" to be used and seeks comment. In general, A4A is supportive of approaches to noise management that allow opportunities for growth in operations as improved technology and operations reduce noise impacts. However, any localized noise approach to international aviation noise, including the use of a noise envelope, must be consistent with the Balanced Approach. Also, we would have to know more details about what the UK is considering to comment in any detail. We have been disappointed that many of the gains the airlines have made in reducing the population exposed to aircraft noise in the UK (and in other parts of the world) have effectively been erased by poor land use policies. In our view, to the extent a "noise envelope" concept is considered, it necessarily should be accompanied by a requirement that local governments and airports take measures to prevent encroachment of incompatible land uses, preserving the gains the airlines make through technology and operations.

- Comments on Compensation, Paragraphs 5.38-5.43: As noted in Paragraph 5.40, the United States has a program in place that allows for sound insulation of homes and certain other buildings under specified noise exposure conditions in the vicinity of an

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<sup>5</sup> Among other things, the DFW community outreach program includes a Noise Center where the public can learn about aircraft noise exposures. The community engagement program is described in the document at the following web link, along with information on the Noise Center: [http://www.dfwairport.com/cs/groups/public/documents/webasset/p1\\_027447.pdf](http://www.dfwairport.com/cs/groups/public/documents/webasset/p1_027447.pdf)

<sup>6</sup> Oxford Economics, "Economic Benefits from Air Transport in the UK." 2011.

airport. This program is funded by the airlines and those using the air transportation system through the United States' Airport Improvement Program and Passenger Facility Charge Program. Importantly, strict, objective criteria are in place for determining when a dwelling is eligible for sound insulation. While properly administered sound insulation programs have an important role to play in the immediate vicinity of an airport, it is critical that they not be relied on in lieu of strong land use management programs. Rather, they should work in concert with such programs.

Thank you for your consideration. Please let me know if you have any questions regarding our comments.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Nancy N. Young", followed by a large checkmark.

Nancy N. Young  
Vice President, Environmental Affairs