



November 9, 2020

Dave St-Germain
Manager, Level of Service and Aeronautical Studies
NAV CANADA
Dave.StGermain@navcanada.ca
Via email

Greetings Dave,

Re: Red Deer Overnight Air Traffic Service Level of Service Review

As you know, COPA represents over fifteen thousand pilots, aircraft owners, aerodromes and airport users in Canada, whose mission is to Advance, Promote and Preserve the Canadian freedom to fly. Our association is the largest Aviation Association in Canada and second largest in the World

This letter is in response to the Aeronautical Study currently being conducted reviewing the overnight Air Traffic Services being offered at the Red Deer Airport to provide our needs, issues and concerns regarding a potential change in the level of service.

Safety Consideration

Red Deer Airport serves as the alternate airport for many smaller General Aviation (GA) aerodromes in the vicinity such as Lacombe, Ponoka, Bashaw, Sundre, Rocky Mountain House, Netook, Olds-Disbury, Bishell, Red Deer Forestry, Clearwater and Three Hills. Most of these smaller aerodromes are not equipped for night or IFR and do not have vital up to date aviation weather information dissemination required for the safe operation of GA flights. Users of these GA airports also rely on the availability of the current level of service being provided by the Red Deer Flight Service Station (FSS) for up to date, 24 hour aviation weather information dissemination as well as Runway Surface Condition (RSC) reports which offers these pilots a safe place to land should they find themselves in an unsafe situation such as inadvertent flight into IFR conditions, and not be able to access their home aerodrome. Edmonton international and Calgary international are not logistical options for GA pilots with high landing and tie down fees.

Additionally, Red Deer is home to many pilots in training. This is in fact the main reason that a limited hours control tower has recently been opened, in order to manage the safe operation of these training flights. As part of their training, pilots must conduct night flights. As these pilots are still new, it is possible that they become disoriented and this is especially true at night. The FSS provides these pilots safe guidance back to the Red Deer airport. There is a possibility that without the current level of service currently being provided at night at the Red Deer airport, some of these training flights would not make a safe return to the airport.

With all the FSS currently under review, not only are the Red Deer services required, but would offer a location where RAAS could be provided should further reductions in levels of service be deemed necessary elsewhere in the province.

COPA believes that the current overnight level of service currently being provided at the Red Deer airport by the Flight Service Station should remain the same in order to insure the safety of GA pilots who depend on the aviation weather information, runway surface condition reports and safe guidance provided by the FSS in case of disorientation.

We hope that our needs, issues and concerns are taken seriously and that NAV CANADA offers proper and safe mitigation should they decide to reduce the overnight level of service currently being provided at the Red Deer Airport.

We look forward to seeing these mitigations prior to a final recommendation to ensure our General Aviation flight operations continue to operate without further risks.

Sincerely,



Christine Gervais
President and CEO - Présidente et chef de la direction
Canadian Owners and Pilots Association -
Association canadienne des propriétaires et pilotes d'aéronefs
cgervais@copanational.org

Advance, promote and preserve the Canadian freedom to fly.