



October 18, 2024

ATTN: Robert Bassey

Office of Airports
Federal Aviation Administration
800 Independence Ave. SW
Washington, DC 20591

Sent via email only to vertiports@faa.gov; Robert.Bassey@faa.gov

Re: VAI and NBAA Joint Comment on Draft EB 105A, Vertiport Design

Dear Mr. Bassey:

On behalf of Vertical Aviation International (VAI) and National Business Aviation Association (NBAA), we appreciate your consideration of our comments related to Engineering Brief 105A for Vertiport Design (for purposes of this letter, "EB 105A"). Our associations have proven track records as being strong advocates for the integration of the next generation of aircraft into the National Airspace. As our efforts in the past have shown, only through well-thought, safety-driven processes, standards, and rules will we be able to succeed. We greatly value all opportunities for industry-agency collaboration, as we all work to integrate all components of advanced air mobility (AAM) into the National Airspace System.

The comments attached are the product of close collaboration between our associations and industry representatives and members. We urge you to closely consider the suggestions therein, as they represent a unified industry voice.

We thank you for your consideration.

Sincerely,

Vertical Aviation International
National Business Aviation Association



FAA Airports

Industry Review Comments Matrix to EB 105A, Vertiport Design

Reviewer Name	Reviewer Org	Reviewer Email	Line#	Page#	Para#	Comment/Rationale	Recommended Change/Proposed Rewrite
Amber Harrison	VAI	AmberH@verticalavi.org	General	General	General	If FAA ultimate intent is to consolidate this Vertiport EB into a combined Vertiport/Heliport AC, there is concern that the current approach - to create a separate Vertiport AC and then consolidate with the Heliport AC - will result in a slow process without the expected outcome and could result in a huge burden on the states which must create new policy, regulation, etc.	In this EB, don't create a new infrastructure class. Use the EB to build onto the existing Heliport AC. VAI would support an adjustment of the December 2026 deadline to facilitate the creation of a consolidated AC in the future.
Amber Harrison	VAI	AmberH@verticalavi.org	General	General	General	While the FAA's traditional methodology and process for developing an Engineering Brief or Advisory Circular has been to create something internal to one division and then share it with other lines of business in the FAA for comment and adjudication those comments, then release it to the public for comment has been shown to produce guidance standards that could conflict with real world applications.	Recommend that going forward that FAA Airports work hand in hand with the other divisions within the FAA as well as key stakeholders in industry to develop the next version of the Vertiport Engineering Brief as well as the final version of an advisory circular. This would allow for a more informed standard to be produced that could be applied with much less consternation. Consider adjudication of all EB105A comments together (industry stakeholders & FAA) to negotiate the final outcome.
Amber Harrison	VAI	AmberH@verticalavi.org	General	General	General	The development/harmonization of data elements (D-p, DCA, etc) and exchange of digital data across the FAA/stakeholder enterprise to support VFR/IFR and PBN flight paths requires early collaboration with multiple LOBs within FAA. While this EB supports piloted, VFR flight, the standards and automation to support the full-range and end-state operating environment (all weather, day/night, IFR, public/private), require long lead times and should begin concurrently with this EB.	Recommend that going forward that FAA Airports work hand in hand with the other divisions within the FAA as well as key stakeholders in industry to develop the standards and automation support that incorporates the requirements for airspace development, OE/AAA, and Flight Standards policies and procedures that can be digitally shared broadly as AAM evolves.
Amber Harrison	VAI	AmberH@verticalavi.org	General	General	General	Simplification where possible within the EB	Where airspace surface characteristics are the same, identify those similarities. Then discuss unique characteristics for each surface.
Amber Harrison	VAI	AmberH@verticalavi.org	General	General	General	Colocation of TLOF and FATO	These concepts should be further defined, if they are intended to be separate areas despite the common characteristics. Request that FAA clarify the intent of the FATO. If essentially collocated FATO serves as a larger TLOF, consider whether the FATO is even necessary and whether the TLOF could be the primary surface.
Amber Harrison	VAI	AmberH@verticalavi.org	General	General	General	At the industry day, FAA verbally indicated that other types of vertical lift aircraft with equal or better performance than a helicopter can use heliports. This is not indicated in the EB.	This should be stated, with an understanding of what it means to have "equal or better" performance. Critically, Aircraft Certification should be involved and should clarify the expected performance of certified aircraft.

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Amber Harrison	VAI	AmberH@verticalavi.org	19	2		The inclusion of a subset for the controlling dimensions that is specific to only the propulsion devices assumes that this dimension will not be that much different than the controlling dimension. However if we look at other variation of eVTOL aircraft such as the XTI Trifan 600 this dimension will be quite a bit smaller and will not adequately account for the aircrafts dimensions.	Request clarification from FAA on why D-p is used for TLOF & FATO sizing requirements. Why is a new subset of controlling dimension being used; if there is a safety value to this proposition, please provide.
Amber Harrison	VAI	AmberH@verticalavi.org	99-103			This comment focuses on the following language: "[t]he standards and guidance contained in this EB are practices the FAA recommends establishing for an acceptable level of safety, performance, and operation in the design of new civil vertiports, and for modifications of existing helicopter and airplane landing facilities to accommodate operations of VTOL aircraft." There is concern that this language could be misinterpreted to mean that if an existing facility is not modified, it is unsafe for VTOL operations. Specifically, there is a concern that state and local regulators would misinterpret in a way that would result in VTOL aircraft not being able to operate from unmodified existing facilities for reasons unrelated to actual aircraft performance.	Delete this section of the EB or drive clarity to ensure that such a misinterpretation does not result in misapplication.
Amber Harrison	VAI	AmberH@verticalavi.org	116 & through out	5		The term "altered" carries with it a negative connotation. The term "configured" or "adapted" would provide the same meaning with less of a negative connotation.	Recommend changing the word "altered" to "configured" or "adapted" to accommodate VTOL aircraft.
Amber Harrison	VAI	AmberH@verticalavi.org	281	11	1.2	There needs to be data provided for the justification of the requirement that the FATO be a "load-bearing" area. Therefore the question is what are the benefits if this area is not intended to be landed upon?	Recommend that the FATO not be required to be a load-bearing area without justification and clear reasoning for this added complexity and cost. If there is a perceived safety concern, FAA should be transparent about that concern.
Amber Harrison	VAI	AmberH@verticalavi.org	683	28	2.6.2	No inclusion of a curved app/dep path in the inspection criteria for hazard and obstruction evaluation.	Recommend the FAA aggressively seek to include curved approach/departure paths into their inspection criteria for hazard and obstruction evaluation as well as capture all approach departure path heading data, both straight and curved, in the FAA Airport Master Record Data Base. Additionally, suggest FAA work internally with ATO Management, including Mission Support Services.
Amber Harrison	VAI	AmberH@verticalavi.org	759-760	31	4.1.7	A circular touchdown position marking is not included in the proposed design of the Vertiport, but could be added through coordination with AAS-110 if an additional touchdown position marking is 'desired'.	Suggest that FAA include a yellow circular touchdown position, as you would find at a Heliport. This concept would be consistent to Heliport consolidation and is familiar to operators, particularly those with chin windows utilized for navigational aid.
Amber Harrison	VAI	AmberH@verticalavi.org	1021-1153	50-53		It should be noted that charging and electric infrastructure is not unique to vertical aviation infrastructure	Suggest to move this guidance to a separate EB to supplement a unified Design Advisory Circular.

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Amber Harrison	VAI	AmberH@verticalavi.org	1024	50	5	The statement "This EB addresses battery driven technologies" fails to recognize the advancements in Hybrid-Electric and Hydrogen powered VTOL aircraft. The geometry and airspace of the infrastructure should not be contingent on the aircraft's power application but rather be the same for all electric, hybrid electric, hydrogen electric, hydrogen, or fossil fuel powered aircraft. Regardless of the power source, it should come down to performance and size.	Recommend including all VTOL power concepts in the development of EB105; no segregation of aircraft based on propulsion systems.