

FAA

Report AV2027006
November 17, 2026

FAA's Newark Area Airspace Relocation Plan Lacked Key Elements Amid Ongoing Staffing and Operational Challenges

Highlights

Federal Aviation Administration (FAA)
AV2027006 | November 17, 2026

FAA's Newark Area Airspace Relocation Plan Lacked Key Elements Amid Ongoing Staffing and Operational Challenges

Requested by Secretary of Transportation Sean Duffy

Our Objective(s)

To assess FAA's relocation of Newark approach control operations from New York to Philadelphia, including FAA's (1) planning and risk assessment process and (2) response to its operational impact on flight delays, cancellations, and safety incidents.

Why This Audit?

Newark Liberty International Airport transported more than 48 million passengers in 2025. In July 2024, FAA transferred Terminal Radar Approach Control (TRACON) responsibilities for the airspace surrounding the airport from the New York TRACON (N90) to the Philadelphia Air Traffic Control Tower (PHL) to address chronic understaffing at N90. This airspace, formerly known as the Newark Area, is now called Philadelphia Area C (PAC). Secretary of Transportation Sean Duffy requested this audit after two instances of air traffic communications failures at PAC.

What We Found

FAA lacked a comprehensive plan to staff PAC and sufficient processes to address risks when relocating Newark Area airspace.

- FAA did not have a comprehensive plan to sufficiently staff PAC. Specifically, FAA's staffing plan did not fully address four key components that could have helped the Agency avoid staffing issues at N90 and PAC: (1) following an established process for realigning Air Traffic Control (ATC) facilities, (2) having a stable plan to address PAC staffing, (3) examining PAC staffing as part of FAA's preliminary safety analyses, and (4) having a comprehensive staffing and relocation project plan prior to the transfer to PHL.
- FAA's processes to address risks when relocating Newark Area did not prioritize challenges associated with outdated documentation.

FAA responded to operational impacts after the Newark Area relocation but continues to face significant challenges.

- FAA made progress certifying PAC trainees, but low staffing numbers have impacted air traffic operations.
- FAA took measures to address risks when implementing a novel PAC telecommunications solution, but challenges remain.



3 **Recommendations** to improve FAA's planning and risk assessment processes as well as the Agency's response to operational impacts associated with relocating Newark Area operations from New York to Philadelphia. *(p. 23)*

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U.S. Department of Transportation
Office of Inspector General

Memorandum

Date: November 17, 2026

Subject: ACTION: FAA's Newark Area Airspace Relocation Plan Lacked Key Elements Amid Ongoing Staffing and Operational Challenges | Report No. AV2027006

From: Marshall Jackson
Assistant Inspector General for Aviation Audits

To: Federal Aviation Administrator

Newark Liberty International Airport is one of the busiest airports in the United States, transporting more than 48 million passengers in 2025. In July 2024, the Federal Aviation Administration (FAA) transferred Terminal Radar Approach Control (TRACON)[1] responsibilities for the airspace surrounding the Newark Liberty International Airport from the New York TRACON (N90) to the Philadelphia Air Traffic Control Tower (PHL). According to FAA, this action was intended to address chronic understaffing at N90. This airspace, formerly known as the Newark Area, is now called Philadelphia Area C (PAC).

On April 28, 2025, air traffic controllers overseeing PAC experienced an approximately 90-second failure of radar and radio contact with air traffic. An additional 90-second outage occurred on May 9, 2025, due to primary and redundant communication infrastructure failures. These events have raised questions about FAA's management of the relocation, including impacts on system redundancy, controller staffing and training, and operational resilience.

In response, Secretary of Transportation Sean Duffy requested[2] that we initiate a review of FAA's relocation of the Newark Area responsibilities to Philadelphia. His request asked that we evaluate FAA's decision-making process, infrastructure preparedness, staffing and training, operational impacts, and mitigation measures' effectiveness at preventing future disruptions at PAC. Accordingly, our audit objectives were to assess FAA's relocation of Newark approach control operations from New York to Philadelphia, including FAA's (1) planning and risk

[1] TRACONs guide aircraft as they approach or leave airspace near a primary airport. Specifically, TRACONs serve as the intermediary between airport air traffic control towers that handle aircraft on the ground to 2,500 feet near an airport and en-route centers that handle aircraft flying at higher altitudes above 10,000 feet.
[2] On May 30, 2025, Secretary of Transportation Sean Duffy requested this audit.

assessment process and (2) response to its operational impact on flight delays, cancellations, and safety incidents.

We conducted this audit in accordance with generally accepted Government auditing standards. Exhibit A details our scope and methodology. Exhibit B lists the organizations we visited or contacted, and exhibit C lists the acronyms used in this report.

We appreciate the courtesies and cooperation of Department of Transportation representatives during this audit. If you have any questions concerning this report, please contact me or Brian Frist, Program Director.

cc: The Secretary
DOT Audit Liaison, M-1
FAA Audit Liaison, AOA-12

Background

As the second largest TRACON in the United States, N90 manages aircraft across a significant portion of the New York metropolitan area.[3] FAA has also classified N90 as a high-complexity air traffic control (ATC) facility.[4]

ATC Staffing Models

FAA develops and applies staffing models to help determine the appropriate staffing levels at each ATC facility. While FAA has used models to establish ATC staffing levels for decades, from 2008 until 2023, the Agency's Controller Workforce Plan referred to a range of acceptable staffing levels as the "staffing standard."[5] The staffing standard counted Certified Professional Controllers[6] (CPCs) and CPCs-In-Training[7] (CPC-ITs). In 2012, a Collaborative Resource Workgroup (CRWG), comprised of FAA Air Traffic Organization (ATO) and the National Air Traffic Controllers Association (NATCA) representatives, began work on another staffing model that estimated ATC staffing levels for CPCs without including CPC-ITs. This CRWG staffing model began developing staffing targets in 2014.

N90 Staffing Challenges and FAA Controller Hiring Incentives

Prior to FAA's decision to move the Newark Area from N90 to PHL, N90 faced significant challenges meeting FAA's controller staffing targets. According to FAA data, N90's CPCs fell from 162 in fiscal year 2010 to 137 in fiscal year 2016. The number of CPCs dropped again to 125 in fiscal year 2020. However, the CRWG staffing target for N90 was 226 CPCs in 2020. Additionally in 2020, N90 only had 153 CPCs and CPC-ITs, while FAA's staffing standard set an ideal range of 173–211 CPCs and CPC-ITs (see figure 1). FAA controllers and supervisors we spoke with stated that Long Island's cost of living and/or the complexity of N90's airspace were contributing factors to N90's staffing challenges.

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[3] Before FAA moved Newark airspace from N90 to PHL in July 2024, N90 managed the airspace delegated to five main areas: (1) Newark, (2) Kennedy, (3) LaGuardia, (4) Liberty, and (5) Islip. These areas were responsible for their namesake airport and surrounding satellite airports.

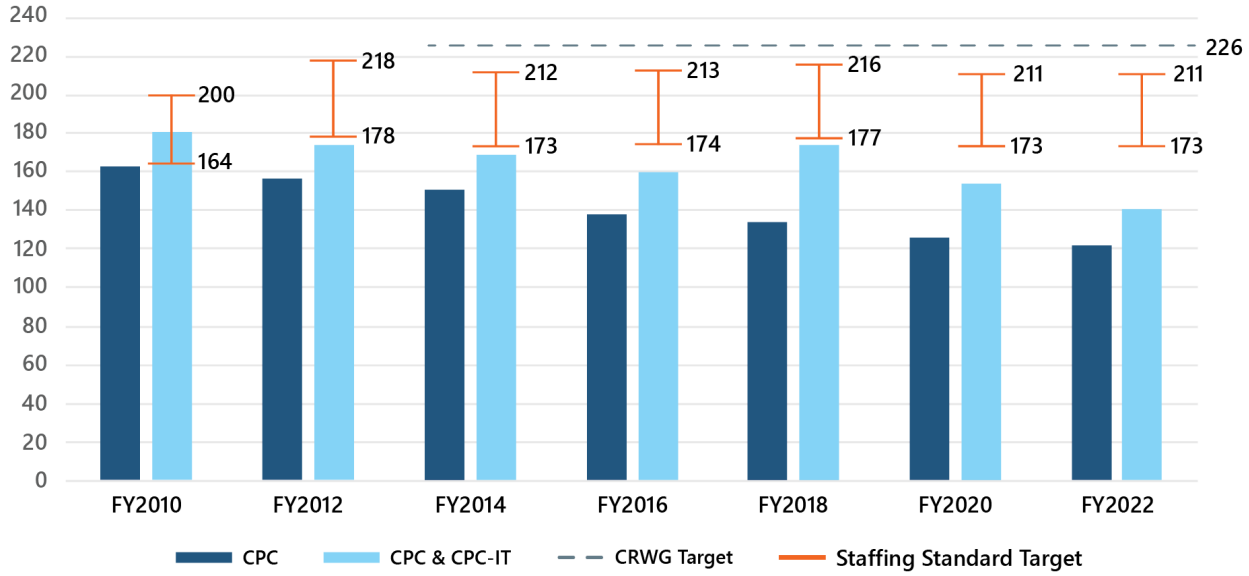
[4] FAA assigns facilities a numerical level—high (levels 10–12), medium (levels 7–9), and low (levels 4–6)—that reflects their airspace complexity and air traffic volume. N90 is classified as a level 12 facility.

[5] FAA's Office of Labor and Analysis created the staffing standard, a mathematical model that relates controller workload to air traffic activity.

[6] CPCs are controllers who achieved full certification on all air traffic positions within their assigned areas. They can also act as on-the-job training instructors for all trainees.

[7] CPC-ITs are air traffic controllers who are still in training and have not been fully certified. This includes CPCs newly assigned to a facility who must recertify, even if they were previously qualified at another facility.

Figure 1. N90 Staffing Compared to FAA's Staffing Targets (2010–2022)



Source: OIG analysis of FAA information.

To enhance staffing, FAA established incentive programs to increase the number of CPCs at N90. According to FAA, over $7.5 million in incentives for hiring at N90 were paid out between July 2016 and February 2019.

These programs included:

- CPCs transferring to N90 received an expedited transfer schedule known as "priority release." (2014)
- CPCs providing on-the-job training received an additional 15 percent per-hour pay supplement and a $3,000 lump sum payment for all N90 CPCs when a CPC-IT became fully certified. (2016 to 2017)[8]
- All N90 CPCs received controller incentive pay of 25 percent. (2017)
- ATC trainees at N90 received enhanced radar training—the Ten, Eleven, Twelve Radar Assessment—at FAA's training center before working at large facilities. (2018)

Despite these initiatives, N90's CPC-IT success rate—the percentage of CPC-ITs who achieve full certification at the facility—was the lowest of any high-complexity TRACON in the National Airspace System (NAS). From 2010 through

[8] On-the-job training financial incentives were implemented at ATC facilities nationwide in 2022 and 2024.

2019, N90's CPC-IT success rate was 33 percent, while the average for other high-complexity TRACONs was 70 percent. Over the same timeframe, N90 experienced management instability and controller absences. From 2010 to 2021, N90 had 12 different Air Traffic Managers. In addition, from 2016 through 2023, N90 had the second highest rate of average sick leave hours per CPC in the NAS compared to other high-complexity TRACONs.

MITRE Study and FAA Initiation of Newark Area Relocation

Due to the ongoing staffing issues at N90, ATO's Air Traffic Services office tasked MITRE[9] with assessing the impact of N90's projected staffing shortage on delays at the major New York region airports in November 2019. The associated January 2020 report[10] found decreases in controller staffing and increases in passenger traffic would cause approximately $110 million in annual delays by 2025, impacting 13 million passengers. The MITRE report also anticipated the impacts of delays in specific areas. From 2010 through 2019, the Newark Area comprised 40 percent of N90's delays. However, the report projected the Newark Area's staffing shortfalls would account for 65 percent of the facility's delays, equating to approximately $70 million in impacts by 2025 (see figure 2).[11]

Figure 2. MITRE's Projected Impact of Delays for the Newark Area

	CY18	CY19	CY20	CY21	CY22	CY23	CY24	CY25	
impacts due to staffing shortfalls**	1.5	1.6	1.6	1.9	1.8	2.0	2.1	2.3	million minutes **delay / year**
	45	45	50	55	55	60	65	70	million $s **delay / cost / year**
	4	4	5	5	5	6	6	7	million **passengers / delayed / year**

** Estimates are approximate and intended to indicate the rough order of magnitude of potential impacts.

Source: MITRE, *Impact of Forecast Staffing Shortfalls at New York Terminal Radar Approach Control Study*, January 2020.

In response to the MITRE report, FAA initiated action to relocate responsibility for the Newark Area from N90 to another facility. In February 2020, FAA conducted site surveys to assess if moving the Newark Area from N90 to PHL was technically feasible. According to former FAA senior officials, PHL was a logical choice for the move because it had airspace adjacent to N90, significantly higher training

[9] MITRE is an independent nonprofit organization specializing in Federally funded research and development.
[10] MITRE, *Impact of Forecast Staffing Shortfalls at New York Terminal Radar Approach Control*, January 2020.
[11] MITRE came to this conclusion using a model based on validated relationships between staffing levels, the filling of critical positions, traffic levels, and delays.

success rates,[12] and more controllers interested in working there. The Agency found this move was technically feasible, determined it would take 18 to 24 months at a cost of around $4.5 million,[13] and identified a need for more administrative and technical operations space at PHL.

In August 2020, FAA initiated the relocation process by sending a notification letter to NATCA regarding the Agency's intent to realign responsibility for the Newark Area from N90 to PHL. This letter included a projected cutover[14] date of September 30, 2021. FAA noted the MITRE study data reflected the Agency's inability to sustain acceptable service levels without significantly impacting NAS users. FAA stated the realignment decision was based on N90's critical staffing shortfalls and controller attrition outpacing controller certifications, despite FAA's numerous initiatives to attract and retain staff. Additionally, the Agency specified it did not intend to reassign existing union controllers from N90 to PHL, and existing Newark Area controllers would be reassigned to other N90 areas on the cutover date.

FAA Lacked a Comprehensive Plan To Staff PAC and Sufficient Processes To Address Risks When Relocating Newark Area Airspace

FAA's plans to ensure sufficient staffing for PAC were not comprehensive. In addition, the Agency's plan for relocating Newark Area to PHL did not prioritize challenges associated with outdated letters of agreement and standard operating procedures.

FAA Did Not Have a Comprehensive Plan To Sufficiently Staff PAC

According to OMB Circular No. A-123,[15] an agency's management should document a change assessment process for identifying, analyzing, and responding to risks related to significant changes—which can include a facility

[12] PHL had a 91-percent success rate for trainees compared to 39 percent for N90 between September 2020 and February 2023.
[13] The cost breakdown excluded some potentially significant expenses such as personnel-related costs and the costs of additional physical infrastructure for reconfiguration.
[14] "Cutover" refers to the date Newark air traffic operations transferred from N90 to PHL.
[15] Office of Management and Budget (OMB) Circular No. A-123, *Management's Responsibility for Internal Control*, March 10, 2026.

relocation such as Newark Area's move to PHL—so that the internal control system is ready to identify, analyze, and respond to changing conditions. But FAA's staffing plan did not comprehensively address four key components that could have helped the Agency avoid staffing issues at N90 and PAC: (1) following an established process for realigning ATC facilities, (2) having a stable plan to address PAC staffing, (3) examining PAC staffing as part of FAA's pre-cutover safety analyses, (4) having a comprehensive staffing and relocation project plan prior to the cutover.

FAA Did Not Fully Follow the Established ATC Facility Realignment Process When Relocating the Newark Area From N90 to PHL

Section 804 of the FAA Modernization and Reform Act of 2012[16] mandated that FAA develop a National Facilities Realignment and Consolidation Report. The report proposed FAA facility realignments and consolidation of services to support the Next Generation Air Transportation System transition and reduce costs without compromising safety. For this report, FAA formed Section 804 workgroups to analyze operational and technical requirements for TRACON operations, workforce impacts, staffing requirements, stakeholder input, and estimated potential realignment costs and benefits. FAA released 4 National Facilities Realignment and Consolidation Reports from 2015 to 2019—containing recommendations for 17 different proposed ATC facility consolidations or realignments. However, the Agency did not follow the Section 804 process for the relocation of Newark Area from N90 to PHL.

Notably, the Newark Area realignment differed from prior Section 804 realignments in the scope outlined by the FAA and NATCA workgroup[17] formed to coordinate and lead the projects. Specifically, the Section 804 consolidation and realignment project scoping agreement in 2017 stated collaborative workgroups would oversee and monitor Section 804 plans for the transition of employees, facilities, equipment, processes, procedures, and operations. In contrast, the Newark Area realignment had its own scoping agreement in 2020 where the workgroup's purpose was to address only equipment issues and automation development. The workgroup eventually expanded the scope to formally include four remote N90 towers. According to one of the workgroup participants, the scope subsequently increased to include items such as training through ad hoc verbal notifications and without formally adjusting the agreement.

Further, in February 2020, FAA's Office of the Chief Counsel informally determined that Section 804 was no longer a valid requirement and FAA's

[16] Public Law Number (Pub. L. No.) 112-95 (2012).
[17] Article 76 of NATCA's and FAA's collective bargaining agreement stipulates that a collaborative workgroup with NATCA representation will inform all facility expansion, collocation, and consolidation projects.

adherence to Section 804 after its initial report was a voluntary ATO policy decision. In addition, former FAA senior officials stated the Agency did not follow the Section 804 process for the Newark Area relocation because it was done to address staffing shortfalls rather than for Section 804's intent of consolidating facilities to reduce costs.

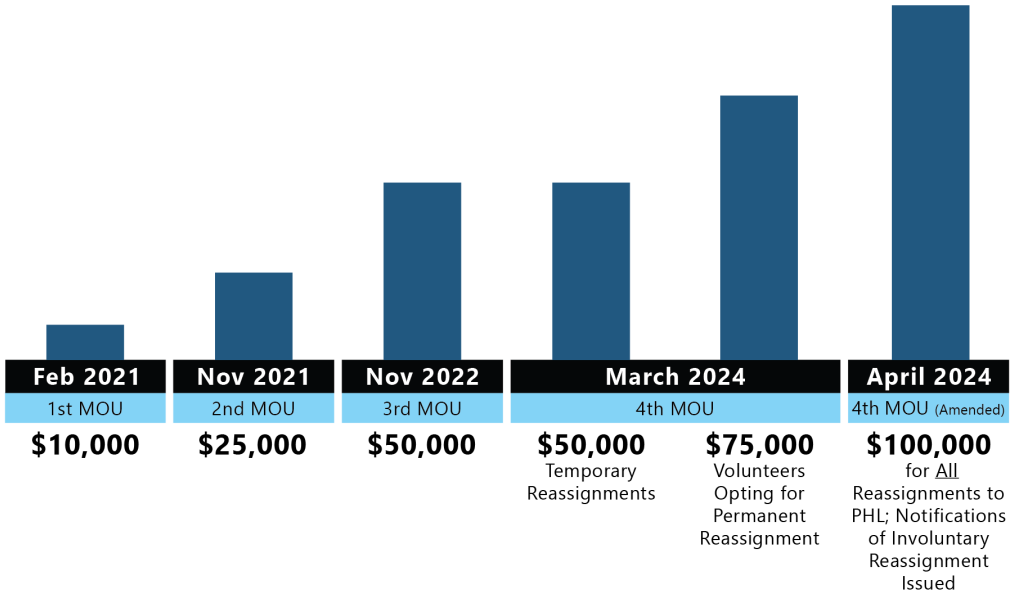
FAA Did Not Have a Stable Plan To Address PAC Staffing

FAA's plans to address PAC staffing went through multiple changes that affected the Agency's ability to establish a sustainable framework for adequate staffing levels. According to former FAA Air Traffic Services senior officials, the Agency did not initially plan to relocate any existing Newark Area controllers to PAC. Instead, according to both former senior ATO officials and NATCA representatives, FAA intended to staff PAC with CPCs from other high-complexity facilities, including PHL. FAA then pivoted in February 2021 from its initial plan by signing a memorandum of understanding (MOU) with NATCA that solicited Newark Area controllers to volunteer to relocate to PHL. The MOU also stated FAA should collaborate with NATCA to select which and how many CPCs to transfer to PHL.

MOUs between FAA and NATCA also increased the initial lump-sum incentives for CPCs volunteering to relocate to PAC multiple times (see figure 3). Specifically, the February 2021 MOU included a $10,000 lump-sum incentive for all CPCs who opted for reassignment. FAA issued additional solicitation memoranda in November 2021 and 2022, increasing the incentive to $25,000 and $50,000, respectively. However, according to current N90 and PAC CPCs, while the initial solicitation initially attracted up to 12 volunteers,[18] this dropped down to 1 just months later. In March 2024, another MOU offered $50,000 to CPCs who temporary volunteered for up to 2 years and $75,000 to CPCs choosing permanent reassignment. The MOU also provided enhanced controller incentive pay for all controllers assigned to N90 and PHL for 4 years. Further, an April 2024 MOU increased the monetary incentives again to $100,000 for all volunteers. The MOU stated FAA was seeking a minimum of 24 CPCs and 6 trainees[19] to transfer to PHL but only 7 CPCs ultimately volunteered. As a result, FAA sent involuntary reassignment notifications to 17 N90 CPCs that same month.

[18] While FAA could not verify the exact number, PAC controllers told us the initial cohort transferring to PHL ranged from 7 to 12 volunteers.
[19] These personnel numbers were agreed to by FAA and NATCA.

Figure 3. MOU Lump-Sum Incentives for CPCs Relocating to PAC



Source: OIG analysis of FAA information.

FAA's plans changed again as the Agency put the relocation on hold for 6 months in May 2023. According to former FAA senior officials and NATCA representatives, the project paused following NATCA's congressional lobbying effort. FAA and NATCA then entered into an informal agreement that established staffing metrics and benchmarks (i.e., certification times, overtime use rates, and applicant interest in the facility) for N90 to demonstrate its ability to further manage Newark airspace. According to a NATCA representative and former ATO officials, N90 did not meet these metrics and benchmarks. After this data was shared with congressional stakeholders, the relocation project resumed in December 2023, and FAA set a new cutover date for July 2024.

However, the pause impacted FAA's staffing plan effectiveness at PHL and N90. According to FAA, the Agency expanded PHL's authorized number of controllers, with one former senior official stating the number increased from 70 to 114. FAA also intended to move additional trainees over to PAC at the time of the cutover. Accordingly, FAA data shows the number of trainees at PHL increased from an average of 11 per year from fiscal years 2018–2020 to 26 per year in fiscal years 2021–2023. Over the same period, the number of trainees at N90 decreased from an average of 36 to 24. According to former ATO senior officials, PAC CPCs, and facility management, FAA assigned the trainees intended for PAC to work in other PHL areas during the project's pause. Moreover, the Agency transferred only

24[20] of the 33 CPCs working in Newark airspace at N90 to PHL. Therefore, PHL did not have enough trainees ready to assist the CPCs working PAC airspace,[21] and the Newark Area was in a weaker staffing situation than it was before the cutover.

FAA's Staffing Plan Did Not Examine PAC Staffing as Part of FAA's Pre-Cutover Safety Analyses

FAA held three Safety Risk Management (SRM) panels prior to the pause in 2023 and another panel in July 2024 that ended only 13 days before the project cutover. The SRMs examined potential safety risks associated with the relocation. FAA and NATCA representatives were on the panel, including a range of subject matter experts such as controllers and technical operations personnel. During the July 2024 SRM panel, the representatives raised workload concerns associated with reducing the number of CPCs transferred from N90 to PHL from 33 to 24. Furthermore, SRM panel observers from an internal oversight office noted FAA lacked a clear plan, which they identified as a hazard, and stated, "[A] timeline on a spreadsheet does not constitute a 'plan.'" But the panel determined that the staffing reduction was out of scope because NATCA and FAA agreed on a staffing number in their MOU, which should have assessed any risks prior to publication. The panel also found that staffing concerns were addressed routinely at facilities without a formal SRM. However, we were unable to identify any formal safety analysis of this risk.

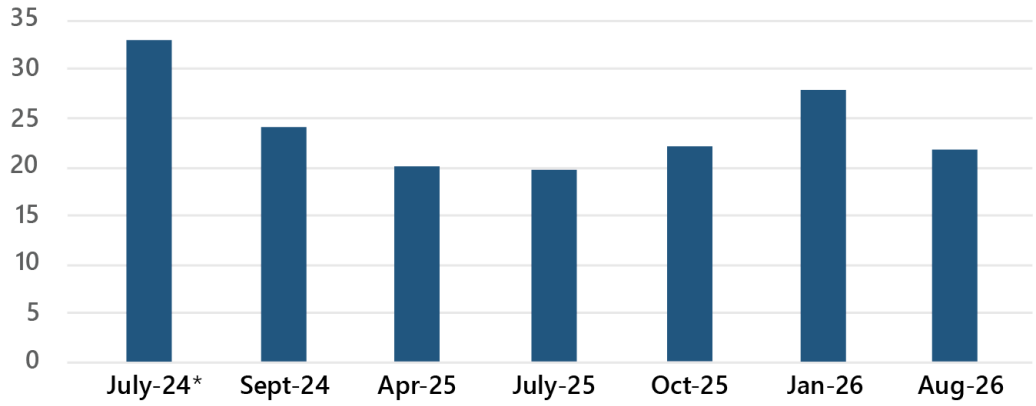
FAA Did Not Have a Comprehensive Staffing and Relocation Project Plan Prior to the Cutover

In September 2024, FAA published a memorandum outlining a staffing and training plan for PAC. The plan projected that PAC would have approximately 25 CPCs by July 2025, which would be bolstered by the addition of CPC-ITs via a projected 75-percent training success rate. However, the actual success rate was under 40 percent, and PAC was down to 19 CPCs that month (see figure 4). In addition, FAA did not begin classroom training for CPC-ITs at PAC until August 2024, which contrasted with prior Section 804 realignments where on-the-job training[22] started prior to the project cutover. Subsequently, FAA continued to struggle with staffing at PAC because its initial staffing framework left little room for error. For example, by October 2025, PAC had lost 6 of the 24 CPCs who transferred from N90 due to a mixture of retirements and other administrative actions. In August 2025, a PAC NATCA representative's presentation to facility

[20] According to NATCA representatives and former ATO senior officials, the Agency and NATCA negotiated transferring 24 CPCs from N90 to PHL.
[21] In a July 2021 FAA and NATCA briefing, they agreed that a minimum of 23 CPCs was necessary at PAC immediately after the cutover and an additional 3–5 CPCs would need to be certified within 5 days of the cutover, raising the total to 26–28 CPCs.
[22] In the ATC certification process, on-the-job training in a specific area follows classroom instruction.

and regional management noted that PAC could be left with as few as 11 CPCs in July 2026—given the projected rate of CPC-IT certifications and potential for the remaining CPCs who transferred on a 2-year detail to PHL to return to N90. In response, FAA signed a new MOU with NATCA in October 2025, offering temporary CPCs who elected to stay an additional 2 years of enhanced controller incentive pay as well as priority placement at the controller's choice of facility.[23] According to FAA, eight CPCs accepted the offer. Even with these extension incentives, PAC is nearly 50 percent under its staffing target with only 22 CPCs in August 2026, fewer than the number FAA initially transferred 2 years earlier. Notably, PAC did not have any trainees receive full certification until October 2025.

Figure 4. Newark Area CPC Staffing From July 2024 to August 2026



* Prior to the July 28, 2024, cutover.

Source: OIG analysis of FAA information.

Interviewees across multiple FAA lines of business stated they felt the relocation of the Newark Area from N90 to PHL transpired with minimal transparency and limited visibility into corresponding efforts across FAA. For example, 7 of the 11 (64 percent) technical personnel and project managers we interviewed stated they faced extensive time pressure and/or felt the relocation was rushed. Several individuals noted distinct differences in the project planning and execution compared to other facility realignment projects they had worked on.

Overall, FAA did not have a clear plan to ensure PAC had adequate staff because hiring incentives did not yield enough volunteers, the Agency's transparency about the Newark Area relocation efforts was minimal, and the schedule was affected by delays and expedited deadlines. Because it did not incorporate

[23] A March 2023 NATCA briefing to FAA projected that given historic training and performance data, N90 controllers on temporary assignment to PAC would need to stay until October 2027 to ensure viable area staffing.

adequate staffing considerations into the larger framework for realigning Newark Area to PHL, FAA faces the likelihood of persistent staffing shortfalls at N90 and PAC for the foreseeable future. As a result, PAC's staffing issues may increase the potential for reduced operational capacity and efficiency in the NAS.

FAA's Processes To Address Risks When Relocating Newark Area Did Not Prioritize Challenges Associated With Outdated Documentation

FAA's relocation of the Newark Area from N90 to PHL did not prioritize updates to certain letters of agreement (LOAs) and standard operating procedures (SOPs). FAA guidance[24] states that where the Agency has implemented interfacility (meaning between different physical facilities) data communications capabilities, ATC coordination should be supported by LOAs between the facilities. In addition, SOPs should reflect appropriate controller procedures that minimize workload. Further guidance[25] allows facilities to prearrange coordination procedures when aircraft under one controller's jurisdiction enter another controller's airspace, given the procedures have a clear operational benefit.

FAA initially intended on updating PAC's LOAs and SOPs before the cutover but instead used N90's procedures.[26] Using N90's LOAs and SOPs let PAC operate hardware and software configurations as if it was a remote tower located physically at N90 rather than at PHL, which FAA intended to be a temporary arrangement. FAA permitted this unique LOA and SOP situation using a memorandum clarifying PAC could operate as an intrafacility (meaning within the same physical facility) with N90. In addition, the memorandum used FAA's rule on prearranged coordination procedures to allow relocated Newark Area controller positions to conduct these procedures with other legacy N90 positions and PAC to continue operating as an intrafacility. CPCs at PAC also continued using N90's Traffic Management Unit (TMU) personnel—who are responsible for minimizing delays by implementing initiatives like ground stops due to factors such as weather, emergencies, or airport congestion—for assistance with situational awareness and air traffic management.

[24] FAA Order JO 7110.65BB, *Air Traffic Control*, February 20, 2025.
[25] FAA Order JO 7210.3EE, *Facility Operation and Administration*, January 22, 2026.
[26] Newark Area's SOPs needed updates prior to the cutover when N90 operated the airspace. However, N90 personnel handled issues resulting from the outdated SOPs via verbal callouts since the areas were physically co-located.

A TRACON providing TMU services for another TRACON located at a different physical facility was novel in the NAS and had the potential to cause safety issues. The July 2024 SRM panel did not find precedent for this practice and identified a reduction in situational awareness as a credible hazard. Therefore, the panel required FAA personnel to identify points of confusion, monitor the issue, and train the workforce. Further, panel participants raised concerns regarding outdated information in N90's LOAs and SOPs as well as that the change in communication methods might delay coordination between controllers. For instance, correspondence between TRACON CPCs and TMU personnel historically relies on in-person communication and calling out changes, which is not possible when the airspace is located at another facility.

We interviewed PAC controllers and N90 TMU staff who shared the SRM panel's concerns. According to PAC controllers and N90 traffic management personnel, the outdated SOPs and LOAs have impacted situational awareness but have not led to significant safety impacts. For example, when keeping multiple aircraft separated, PAC controllers may need to communicate with CPCs in areas located at N90. While Newark Area CPCs were co-located in the same room as other N90 areas and could call out a flight change, PAC CPCs need to use landline phones to call N90 areas. This additional step adds to the time between controllers' correspondence and action. The July 2024 SRM panel noted that this additional time was a concern because seconds can have a critical impact on the safety of operations due to the density and complexity of N90's airspace.

According to ATO personnel, FAA was unable to update PAC's LOAs and SOPs prior to the cutover because of competing priorities associated with the project's 6-month pause. Recognizing the need for on-site assistance, the Agency trained PHL TMU staff on N90 traffic management operations and transitioned the TMU function to PHL's traffic management staff in September 2025. FAA also acknowledged updating the relevant LOAs and SOPs was necessary in a November 2025 MOU stating, FAA's legacy "procedures no longer align with the [PHL and Newark Area] operational realignment." Subsequently, FAA created a workgroup to revise relevant SOPs and LOAs for PAC's interfacility data communications and hold an SRM panel to review the changes. As of June 2026, the SRM panel has yet to convene.

Overall, though FAA has taken steps to update PAC's LOAs and SOPs, not doing so prior to the cutover introduced communication and efficiency risks. Further, the Agency has yet to finish updating the procedures nearly 2 years after the cutover.

FAA Responded to Operational Impacts After the Newark Area Relocation but Continues To Face Significant Challenges

FAA is making progress certifying new trainees at PAC, but low staffing numbers have impacted the Agency's operations. In addition, FAA took numerous measures to address risks when implementing a novel PAC telecommunications solution, but challenges remain.

FAA Made Progress Certifying PAC Trainees, but Low Staffing Numbers Have Impacted Air Traffic Operations

While FAA made progress fully certifying PAC trainees, the Agency's persistent low staffing triggered operating limitations at PAC and Newark Liberty International Airport. The time it takes to fully certify a trainee depends on variables such as their prior air traffic experience and medical clearance as well as training instructors' availability. In an effort to increase staffing at PAC, the facility has had multiple trainee cohorts since August 2024.[27] Of PAC's 3 initial cohorts, 9 of 23 trainees (39 percent) were fully certified in a little over a year, on average.[28] The time to fully certify these controllers was a significant improvement compared to the average of 2 years it took N90 trainees prior to the cutover. However, PAC faces additional challenges due to the six temporary CPCs who returned to N90 in July 2026. According to PAC controllers and supervisors we interviewed, such staffing constraints will limit PAC trainees' opportunities for on-the-job training and potentially extend the time it takes to fully certify them, impacting overall PAC staffing.

Additionally, N90's controller staffing levels remain a challenge for FAA. Specifically, the facility's number of CPCs remains below targets established by the CRWG staffing model (226 CPCs) and FAA's staffing standard target (160 CPCs). After FAA relocated Newark Area controllers to PHL, N90 staffing hit a historical low of 108 CPCs in September 2024. At the end of fiscal year 2025, N90 had 115 CPCs on-site. However, the facility officially reported a staffing level of 129 because it included the 14 CPCs on temporary duty in PHL. Of these

[27] As of February 2026, PAC added four more trainee cohorts which have started the training process in PHL.
[28] Of the 14 remaining trainees, 10 withdrew from the training program (43 percent), 2 became medically incapacitated (9 percent), and 2 are going through on-the-job training (9 percent).

14 controllers, FAA reported that 6 returned to N90. Accordingly, FAA faces a scenario where the Agency's October 2025 incentives to extend the appointments of temporary CPCs at PAC negatively impacts N90 staffing while the return of temporary CPCs to N90 negatively impacts PAC. Further, FAA's 2026 Air Traffic Controller Workforce Plan estimates that N90 will have the second highest attrition of high-complexity TRACONs over the next 3 fiscal years, potentially losing 37 CPCs.

Meanwhile, the persistent low staffing at PAC has caused FAA to limit the number of flight operations around PAC and Newark Liberty International Airport in order to ensure safe operations. According to FAA, from January 2023 through June 2024, prior to the cutover, the Newark Area had 41 staffing triggers, which are actions FAA management takes when staffing constraints necessitate reducing the amount of air traffic in the affected airspace to maintain safety. In comparison, after the cutover, PAC's low staffing resulted in 460 staffing triggers from July 2024 to August 2025. Moreover, as of January 2026, TMU staff at PHL are at 50 percent of the facility's internal target of 12 CPCs. To address this shortfall, FAA included a provision in a June 2026 MOU with NATCA that offers $60,000 to existing PHL controllers who reassign to PAC. According to FAA officials, PAC's staffing constraints were exacerbated by controllers' using leave at a high rate, including sick and workers' compensation leave.

In May 2025, FAA conducted an external compliance verification at PHL to assess the facility's overall performance and identify potential risks and noncompliance. This assessment noted multiple instances where PAC controllers' workloads increased to a level where their positions should have been split up to reduce single controllers' workloads, but the positions were not split due to low staffing. The assessment also found a high-risk noncompliance where a controller was observed failing to advise an aircraft of bad weather, which required a corrective action plan.

In response to PAC staffing challenges, FAA issued an interim order in June 2025 that reduced Newark Liberty International Airport's number of permitted aircraft arrivals and departures. The reasons the Agency cited for the reduction in air traffic included PAC staffing constraints and equipment outages as well as the airport's ongoing runway construction.[29] In September 2025, FAA extended the interim order another year since PAC's staffing pipeline had not materially changed. In June 2026, FAA extended the order a third time, limiting the number of scheduled aircraft operations at Newark Liberty International Airport through October 30, 2027. The order states, "FAA finds that it is not in the interest of safety or reasonable to lift the operating limitations given the number of CPCs

[29] In June 2025, FAA completed major rehabilitation work on Newark Liberty International Airport's runway 4L-22R but continues to do intermittent work.

presently serving [the Newark Area…While] the staffing pipeline is improving, FAA does not expect the target number of CPCs…to be realized before the end of the Summer 2027 scheduling season."

As a result of FAA's inability to fully staff PAC, the efficiency and effectiveness of the NAS has been impacted by reduced flight operations, which may have broader economic consequences.

FAA Took Measures To Address Risks When Implementing a Novel PAC Telecommunications Solution, but Challenges Remain

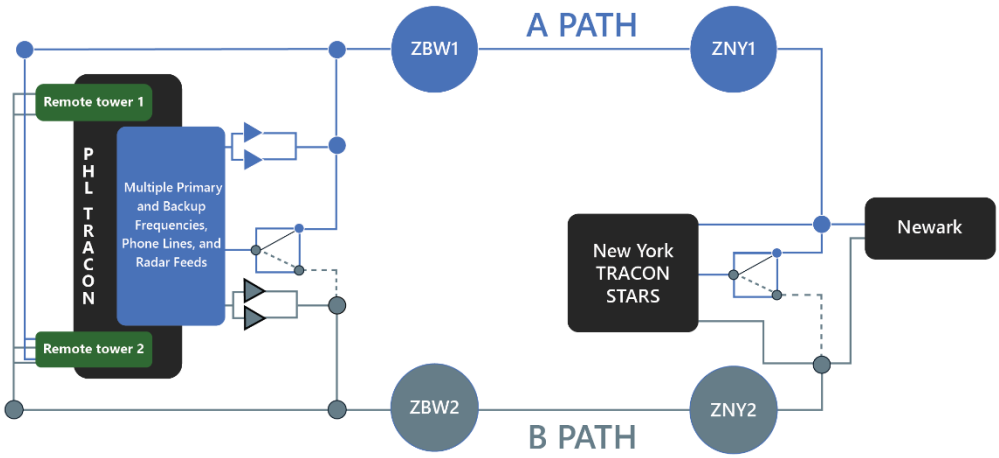
To ensure FAA's cutover of Newark Area services from N90 to PHL was safe and maintained continuity of operations, FAA implemented a novel telecommunications solution at PAC that came with certain risks. Subsequently, the Agency faced significant challenges following the cutover to PHL. In response, FAA took actions to address these risks, which resulted in decreases in radar and frequency outages. However, FAA still faces challenges moving to a permanent configuration for PAC's telecommunications infrastructure.

FAA's Novel Telecommunications Development at PAC and Associated Risks

FAA originally planned to modify PHL's Standard Terminal Automation Replacement System (STARS)[30] to cover Newark Area operation telecommunications, but the estimated timeline of over 5 years and a cost of $36 million led the Agency to pursue an alternative approach to expedite the relocation. Accordingly, FAA developed a novel, temporary solution to facilitate the relocation in 2022. In 2024, FAA implemented a Remote Terminal Automation Configuration (RTAC), which fed STARS data from N90 to PHL through the FAA Telecommunications Infrastructure (FTI) network. The data followed two main data transmission line pathways (A path and B path) and treated PAC as a remote tower to N90 (see figure 5).

[30] STARS is a foundational automation system installed at TRACONs that provides controllers with visual awareness of air traffic operations and weather along with other displays to maintain air traffic safety.

Figure 5. Philadelphia Area C RTAC Original Configuration



Note: ZBW1 and ZBW2 refer to the Boston Air Route Traffic Control Center (ZBW). ZNY1 and ZNY2 refer to the New York Air Route Traffic Control Center (ZNY).

Source: OIG analysis of FAA Information.

While remote connections are common between air traffic control towers and TRACONs, this was the first time a TRACON's airspace was treated as a remote tower, which introduced increased operational risks. For example, in the event of data loss, ATC tower controllers can look out the tower window for visual awareness in areas under their operational responsibility, which a TRACON controller is unable to do. Additionally, this remote connection partly relied on aging copper lines and rerouted data through a Boston air traffic control facility due to bandwidth limitations. Further, because of PAC's remote tower design and the amount of data being transmitted, PAC became increasingly reliant upon a stable FTI network and was heavily impacted by temperamental telecommunications infrastructure.

In March 2022, FAA convened a SRM panel to examine RTAC's potential safety risks.[31] The SRM panel identified the risk that FAA could lose automation services and surveillance support if telecommunication lines between N90 and PHL failed, resulting in FAA's inability to provide ATC radar services. To mitigate this risk, the SRM panel proposed permitting data surveillance hardware on PAC's remote tower equipment called Direct Sensor Feed (DSF). According to the SRM panel, a telecommunications outage would not impact the DSF, allowing the facility to vector aircraft and see aircraft call signs and altitude. Though FAA automation

[31] SRMs use a risk matrix to assign an overall risk level (i.e., Low, Medium, or High) based on the assignment of severity classifications (i.e., Minimal, Minor, Major, Hazardous and Catastrophic) and likelihood classifications (i.e., Frequent, Probable, Remote, Extremely Remote, and Extremely Improbable).

personnel noted that DSF would have minor data lag times and more limited functionality compared to a fully functioning STARS solution.

A May 2024 N90 report raised concerns prior to the cutover about network anomalies associated with the facility's remote tower displays. Accordingly, FAA's Terminal Second Level Engineering Group recommended N90 disable its Variable Site Parameter (VSP), which prevents the DSF from functioning in the event of a system outage, resulting in blank radar screens for 30 seconds or more. According to N90 personnel, they historically enabled VSP because CPCs in the facility's remote towers do not rely on their screens as much as CPCs in TRACONs, since they can look out the window to see flight activity. N90 enabled the VSP because N90 CPCs' preference was to monitor air traffic through the window during an outage, letting STARS restart without activating the DSP to avoid data lag times and allow full functionality when the data reloaded. However, even after the cutover, N90 did not disable its VSP and the remote tower configuration at PHL introduced potential telecommunications risks for PAC during a telecommunications infrastructure outage.

Moreover, FAA identified another issue with STARS's interactions with remote towers associated with the Southern California TRACON in June 2022. These remote towers began experiencing outages and freezes due to STARS submitting excessive data retransmissions. These retransmissions occurred due to data going over different types of circuits, causing data congestion and subsequent data bursts that can overwhelm the system. To address these issues, FAA held SRM panels in June 2023 and 2024, which determined affected telecommunications lines needed STARS software updates and increased bandwidth capacity. Notably, FAA did not complete the software updates at the time Newark Area moved to PHL in July 2024.

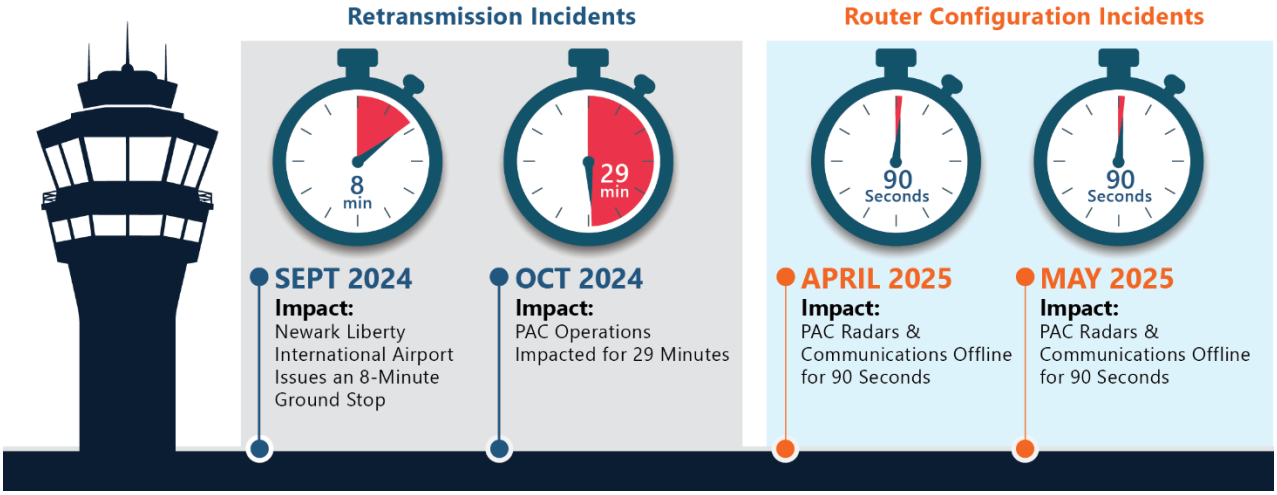
FAA's Telecommunications Challenges After the Newark Area Relocation

Following the cutover, PAC had issues with both its STARS and its communication frequencies. For example, in September 2024, PAC experienced excessive data overload and subsequent frozen radar screens caused by the same data burst issue that affected the Southern California TRACON, resulting in a ground stop at Newark Liberty International Airport for 8 minutes. In October 2024, a similar issue and additional radar freezes impacted controllers' displays for 29 minutes. FAA completed a significant STARS software update in November 2024, and according to FAA data, incidents causing data bursts significantly decreased.

However, PAC still experienced significant FTI issues, impacting STARS displays and communications infrastructure. On April 28, 2025, issues with PAC's telecommunications circuit and complications from a router configuration caused five of the facility's radar displays to go offline. Because VSP was enabled, controllers could not access the DSF, leaving controllers without visual awareness

of their assigned air traffic for approximately 90 seconds. The same issue impacted controller visibility for 90 seconds in May 2025, caused by an FTI network failure that switched the data flow from a congested route over to another route, overwhelming the active service line (see figure 6). That month, FAA released an internal report[32] stating that the RTAC "introduces an avoidable reliance" on temperamental telecommunications and that this reliance has large impacts—such as freezing displays, blank displays, and loss of data—when telecommunication loss occurs.[33]

Figure 6. Select PAC Incident Operational Impacts



Source: OIG analysis of FAA information.

FAA's telecommunications challenges at PAC were further evident through our interviews and in FAA reports. Six of eight (75 percent) PAC controllers we interviewed said that following the cutover, they started having issues with their equipment that included losing display feeds and constant communication line interruptions such as clicking and popping sounds, inaudible audio, and dropped calls. FAA's May 2025 internal report also noted that the configuration for consolidated telecommunication services—such as communication frequencies and interfacility phone lines transmitted over high-capacity FTI lines—rendered PAC's FTI infrastructure vulnerable to intermittent data loss. PAC's configuration involving multiple override phone lines[34] was an additional complication because, when faced with telecommunication infrastructure issues, it produced flashing lights that indicate an active call when a call was not active and unwanted audio

[32] FAA, *Philadelphia Area C (PAC): Telecommunications Vulnerabilities and Hardening Solutions*, May 5, 2025.
[33] According to ATO senior officials, the presence of multiple vendor networks and vendor-provided network components led to additional complexity and slower incident response times.
[34] Controllers use override lines to communicate with each other. For these lines, the receiving controller sees flashing lights indicating a call is active, and only the calling controller can end the call.

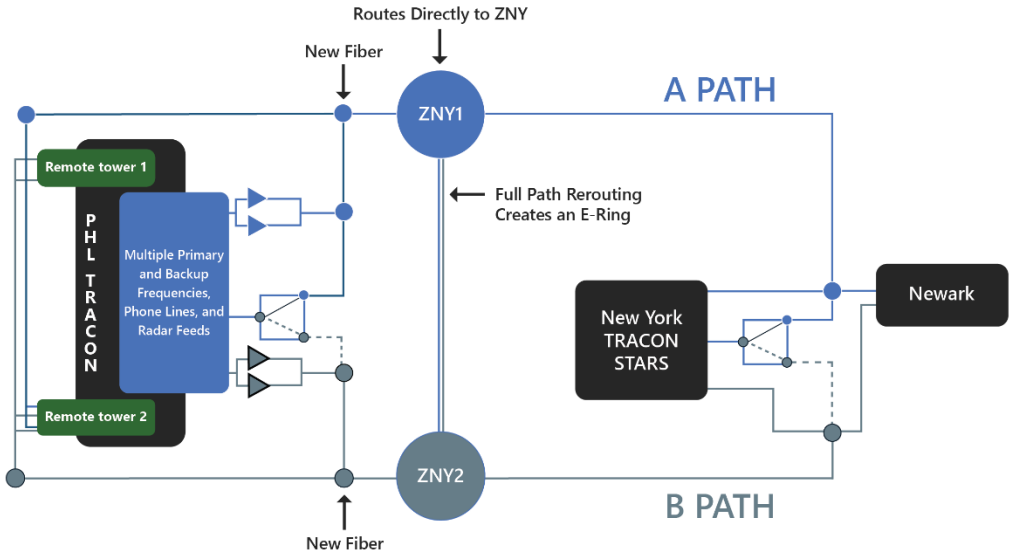
in controller headsets when telecommunication issues occurred. Notably, FAA data shows telecommunications-related outages at PAC increased 28 percent following Newark Area's relocation.

FAA's Actions To Address Risks Associated With PAC's Telecommunications Solution

Since PAC experienced telecommunication outages and other technology-related issues, FAA has taken significant steps within the past year to enhance and update its telecommunications infrastructure to alleviate these issues. These steps were completed between May 2025 and August 2025 and include FAA:

- Upgrading controllers' radio frequencies, which automatically switch between separate paths when telecommunications infrastructure degrades or line loss occurs. (June 2025)
- Implementing modifications enabling air traffic to access the DSF in the event of a STARS outage, allowing controllers to see local radar feeds and eliminating radar screen outages. (May 2025)
- Updating the phone configuration for ATC override lines while eliminating false call alerts and unwanted flashing call indicators and audio during telecommunications-related events. (May 2025)
- Updating an improper network configuration to improve A and B path data-switching capabilities that impacted how voice and data were transmitted—which occurred during PAC's 90-second communications failures in April and May 2025. (May 2025)
- Creating an ethernet-ring (E-ring) between N90 and the two telecommunications access points at PHL to replace the old parallel paths to Boston Air Route Traffic Control Center. This adds new fiberoptic lines between N90 and PHL and provides additional redundancy, more resiliency against path failures, and increased bandwidth (see figure 7). (August 2025)

Figure 7. Current Remote Tower Configuration for PAC



Source: OIG analysis of FAA information.

We confirmed FAA's measures to address telecommunications risks at PAC through our interviews and analysis of FAA data. PAC controllers we interviewed identified improvements with their technical equipment since summer 2025. For example, 14 of 16 (88 percent) PAC controllers, supervisors, and technical operations specialists noted that radar-related issues have significantly improved, although 6 controllers said they are still having issues with their frequencies. In addition, FAA data showed PAC's radar and STARS feed outages decreased from 35 outages from August 2024 to May 2025 to 17 outages from June 2025 through March 2026 (nearly 50 percent). During the same timeframe, PAC's communication frequency outages reduced from 65 to 31 outages (48 percent) and interfacility voice outages went down slightly from 73 to 69 outages.

FAA Faces Challenges Moving to a Permanent Configuration for PAC's Telecommunications Infrastructure

FAA has faced challenges moving on from using the current RTAC telecommunications configuration, which the Agency intended to be a temporary solution. While RTAC's durability has improved, PAC continues to rely on temperamental telecommunications infrastructure until the area is incorporated into PHL's STARS. For example, PAC's need for updates were evidenced by the telecommunications outage events in June 2026, one of which left controllers without visual awareness of aircraft for 7 minutes. Largely mirroring FAA's initial telecommunications plans, the Agency began testing the incorporation of PAC's airspace into PHL's STARS in summer 2025. The Agency initially planned to roll out the modifications to PHL STARS incorporating PAC in September 2025, which was later pushed to late March 2026. However, the project was subsequently

paused that same month. PAC personnel noted concerns about the planned modifications resulting in functional limitations that could have impacted safety. According to ATO senior officials, FAA pushed the goal for completing modifications to STARS at PHL to September 2026. However, further FAA analysis determined that moving the STARS feed to PHL could reduce operational efficiency and situational awareness. As a result, the Agency is focusing on improving the existing STARS connections between N90 to PHL. So far, the estimated cost of this effort is nearly $9 million.

The Newark Area realignment project costs have significantly exceeded FAA's original estimates and continue to accrue. While FAA's feasibility study in February 2020 estimated a total cost of roughly $4.5 million, the Agency's report in January 2021 that outlined the requirements necessary for the relocation estimated a total project cost of $23 million over 5 years. However, FAA provided documentation showing that, to date, capital-related expenditures have reached nearly $40 million and project-related personnel costs are projected to exceed $30 million. These increased costs were due to the multiple incentives FAA offered PHL and N90 controllers for the realignment project as well as the Agency's various telecommunications-related efforts to accommodate the Newark Area at PHL.

As a result of FAA's decision to use a novel telecommunications solution for a major TRACON facility, the Agency experienced significant challenges that had the potential to impact the safe operation of Newark airspace. While the Agency completed multiple steps that enhanced the durability and safety of PAC's current RTAC telecommunications configuration, the facility still faces risks associated with relying on this temporary configuration that is more susceptible to telecommunication disruptions and complications.

Conclusion

The New York TRACON manages some of the Nation's most complex airspace, and it is critical FAA ensures such an important facility is sufficiently staffed to maintain safe operations. Intending to balance complex airspace and air traffic controller staffing issues, FAA has transferred responsibility for the Newark Area to the Philadelphia Air Traffic Control Tower. However, transferring responsibility for complex airspace to a new physical location is an immense challenge. FAA struggled to develop a comprehensive, consistent strategy for relocating Newark's airspace that addressed project delays and met PAC staffing goals. Going forward, it is crucial that FAA takes steps to ensure processes are in place to holistically review and address air traffic facility realignment project risks, which are also transparent to stakeholders and capture their input. Given larger air traffic controller staffing challenges across the NAS, such efforts will be integral

for FAA to ensure safe operations and prevent the flying public from being negatively impacted by the Agency's future changes to air traffic facilities.

Recommendations

To improve FAA's planning and risk assessment processes as well as the Agency's response to operational impacts associated with relocating Newark Area operations from New York to Philadelphia, we recommend that the Federal Aviation Administrator:

1. Create a holistic, risk-based framework for future facility realignments and/or consolidations, including ensuring transparency across agency silos, stakeholder input, and a comprehensive plan addressing technical and staffing needs.

2. Complete ongoing efforts to update Letters of Agreement and Standard Operating Procedures governing the New York TRACON and Philadelphia Area C.

3. Complete ongoing efforts to enhance the resiliency and stability of the Newark Area STARS feed at PHL that sustains safety and overall functionality.

Agency Comments and OIG Response

We provided FAA with our draft report on September 9, 2026, and received its official response on October 27, 2026, which is included as an appendix to this report. FAA concurred with our three recommendations and provided appropriate actions and completion dates. Accordingly, we consider all recommendations resolved but open pending completion of the planned actions.

Actions Required

We consider recommendations 1 through 3 resolved but open pending completion of planned actions.

Exhibit A. Scope and Methodology

This performance audit was conducted between July 2025 and September 2026. We conducted this audit in accordance with generally accepted Government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Our audit objectives for this Secretarial-requested audit were to assess FAA's relocation of Newark approach control operations from New York to Philadelphia, including FAA's (1) planning and risk assessment process and (2) response to its operational impact on flight delays, cancellations, and safety incidents. In doing so, we analyzed Federal laws, applicable FAA guidance and criteria documents, applicable criteria for air traffic operational rules, MOUs between FAA and NATCA that impact N90, and collective bargaining agreements between FAA and NATCA.

We also analyzed documentation on what data informed FAA's course of action for and subsequent implementation of the Newark Area's relocation. We evaluated this type of documentation from when FAA held initial internal discussions in 2017 through July 2026. We reviewed FAA's internal planning and coordination documentation related to the move, including preliminary assessments, consultant studies, training plans, and briefings made to FAA personnel and external stakeholders. We reviewed FAA-provided N90 and PHL staffing-related data from October 2009 to March 2026 to ascertain staffing trends, training fail rates, and productivity rates. We also reviewed delay and cancellation documents to determine historical trends before and after the realignment.

In addition, we reviewed safety risk management documents along with telecommunications outage, staffing trigger, and safety incident reporting documents from N90 and PHL. We examined program technical reports and evidence of pre-cutover equipment testing. We reviewed post-incident white papers and summaries of actions taken to address technical issues. Further, we reviewed estimated and actual Agency costs related to equipment, technical components, and personnel-related expenditures.

We interviewed current and former ATO personnel throughout various offices including senior leadership, management, supervisors, financial analysts, legal counsel, air traffic controllers, traffic management coordinators, and technical operations specialists. We interviewed personnel at the William J. Hughes Technical Center for Advanced Aerospace and MITRE who worked on analyses that informed the Newark Area realignment project. In addition, we interviewed current and former NATCA personnel who worked on the realignment.

Exhibit B. Organizations Visited or Contacted

FAA Headquarters

Air Traffic Safety Oversight Service

Air Traffic Services

Office of Finance and Management

Office of the Chief Counsel

Office of Labor Analysis

Program Management Organization

Technical Operations

FAA Air Traffic Control Facilities

New York TRACON

Philadelphia Tower

FAA Technical Center

FAA William J. Hughes Technical Center for Advanced Aerospace

Other Organizations

MITRE

National Air Traffic Controllers Association

Exhibit C. List of Acronyms

ATC	Air Traffic Control
ATO	Air Traffic Organization
CPC	Certified Professional Controller
CPC-IT	Certified Professional Controller In-Training
CRWG	Collaborative Resource Workgroup
DOT	Department of Transportation
DSF	Direct Sensor Feed
FAA	Federal Aviation Administration
FTI	FAA Telecommunications Infrastructure
LOA	Letter of Agreement
MOU	Memorandum of Understanding
N90	New York TRACON
NAS	National Airspace System
NATCA	National Air Traffic Controllers Association
OIG	Office of Inspector General
PAC	Philadelphia Area C
PHL	Philadelphia Tower
RTAC	Remote Terminal Automation Configuration
SOP	Standard Operation Procedure
SRM	Safety Risk Management
STARS	Standard Terminal Automation Replacement System
TMU	Traffic Management Unit
TRACON	Terminal Radar Approach Control
VSP	Variable Site Parameter
ZBW	Boston Air Route Traffic Control Center
ZNY	New York Air Route Traffic Control Center

Exhibit D. Major Contributors to This Report

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SUSAN **CROOK-WILSON**	SUPERVISORY WRITER-EDITOR

Federal Aviation Administration

Memorandum

Date: 10/27/2026

To: Marshall Jackson, Assistant Inspector General for Aviation Audits

From: Barbara Barnet, Director, Audit Management AOA-12 BARBARA LOURDES BARNET Digitally signed by BARBARA LOURDES BARNET Date: 2026.10.27 09:14:41 -04'00'

Subject: Federal Aviation Administration (FAA) Response to Office of Inspector General (OIG) Draft Report: *FAA's Newark Area Airspace Relocation Plan Lacked Key Elements Amid Ongoing Staffing and Operational Challenges* | Project No. 25A3005A000

In July 2024, the Federal Aviation Administration (FAA) transferred Terminal Radar Approach Control (TRACON) responsibilities for the airspace surrounding Newark Liberty International Airport (EWR) from the New York TRACON (N90) to the Philadelphia Air Traffic Control Tower (PHL). This initiative, which transferred responsibility for air traffic control for EWR specifically to Philadelphia Area C (PAC), was undertaken to address N90 staffing challenges and sustain safe, efficient air traffic services. The FAA recognizes the vital importance of robust planning, risk mitigation, and operational continuity when executing major airspace reconfigurations. To strengthen transparency, internal collaboration, and technical execution across all three areas highlighted in the report, the Agency is actively executing the following initiatives:

- **Holistic Framework and Governance:** Building a risk-based framework to ensure structured communications, training, and cross-silo transparency for future facility realignments and/or consolidations.

- **Operational Agreement Revisions:** Establishing a joint workgroup between PHL Area C and surrounding airspace stakeholders to enhance collaboration and operational efficiency by systematically updating and finalizing 97 Letters of Agreement (LOAs) and Standard Operating Procedures (SOPs), with 17 already submitted for internal review.

- **STARS Resiliency:** Completing FAA's ongoing efforts to ensure the stability of the Standard Terminal Automation Replacement System (STARS) feed into PHL.

Based on its review of the draft report, FAA concurs with the OIG's three recommendations as written. We plan to complete actions to address all recommendations by December 31, 2027.

We appreciate the opportunity to review and respond to the draft report. Please contact Barbara Barnet at Barbara.Barnet@faa.gov if you have any questions or require additional information.

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