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March 13, 2013

Mr. David P. Medina  
Manager, Operations Support Group, AJV-C2  
Airspace Study 13-AGL-06NR  
Department of Transportation  
Federal Aviation Administration  
2601 Meacham Blvd.  
Fort Worth, TX 76137

Re: Proposed Establishment of Grayling Temporary Military Operations Area, Northern Michigan

Mr. Medina,

The Aircraft Owners and Pilots Association (AOPA) representing more than 400,000 general aviation members nationwide, submits the following comments in response to the United States Air Force (USAF) request to establish the Grayling Temporary Military Operation Area (TMOA) in support of Exercise Northern Strike in Northern Michigan. While temporary in nature, the proposed Grayling TMOA requires modification to reduce or lessen the impact on Instrument Flight Rules (IFR) operations. These mitigations should include coordination with Minneapolis Air Traffic Control Center (ARTCC) to allow civil operations through the TMOA when possible.

**Opportunity to lessen impact on IFR route**

The floor of the proposed Grayling TMOA would leave portions of V78-609 unusable. This would force pilots utilizing this Victor route to circumnavigate a large portion of the proposed TMOA airspace resulting in longer and less efficient routing. To mitigate the impact on this airway, AOPA would ask the Minneapolis ARTCC and the USAF to work collaboratively to mitigate the impacts on general aviation pilots. Allowing aircraft operating under IFR to transition through the TMOA when able would help reduce the impact on the civil operating community.

**Summary**

The coordination between the Federal Aviation Administration and the USAF will go a long way in mitigating the impact on the general aviation community. AOPA appreciates the opportunity to submit comments on the proposed establishment of the Grayling TMOA in support of exercise Northern Strike.

Sincerely,

Melissa McCaffrey  
Senior Government Analyst  
Air Traffic Services