



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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August 3, 2007

Ms. Edith Parish
Manager, Airspace and Rules Group
Docket Management System, M-30
West Building Ground Floor
Room W12 -140
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: FAA Docket No. 2006-26192; Airspace Docket No. 06-ASO-11

Dear Ms. Parish:

The Aircraft Owners and Pilots Association (AOPA), representing over 413,000 general aviation pilots, including over 14,800 in the state of New York, opposes the Notice of Proposed Rulemaking (NPRM) to restructure the Adirondack Airspace Complex. Airspace in the Northeastern United States accommodates some of the busiest sectors in the entire country. Therefore, before the Federal Aviation Administration (FAA) considers any changes to existing Special Use Airspace (SUA), it should require that the Air National Guard (ANG) evaluate all existing SUA to ensure the most efficient utilization of our nation's airspace. AOPA also opposes the proposed use of dynamic airspace considering it is a concept that has yet to be fully developed and defined by the FAA.

Similar Airspace Complexes Proposed Within 150 nm

AOPA questions the need to have two nearly identical SUA expansions (Adirondack Airspace Complex and the Condor MOA) developed within 150 nm of one another considering the use and type of training each is intended for. AOPA is concerned that consideration is not being given to all existing SUA as a collective resource for the ANG. AOPA contends that expanding both Condor and Adirondack SUA areas would result in redundant SUA and would not be an efficient use of the NAS.

AOPA Concerned With Dynamic Airspace Concept

According to the NPRM and discussions with military leadership, the ANG intends to utilize the Dynamic Airspace concept through the use of real-time block altitudes. While AOPA is supportive of the military's desire for real-time airspace management, the implementation of the dynamic airspace concept has yet to be defined. The NPRM does not provide specifics on how pilots will be notified of altitude variations within a defined Military Operations Area (MOA).

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AOPA Recommends Charted Frequency

For decades AOPA has advocated for a system that will provide pilots with real-time status of SUA. A real-time SUA information system is essential to maintain a safe environment for both General Aviation (GA) and military pilots. Independent of this proposal, which AOPA opposes, the association recommends that the FAA require a charted radio frequency and telephone number be implemented for all new SUA proposals. FAA should also require that these resources be updated regularly by the managing agency responsible for the airspace. A frequency and phone number provides a real-time message alerting pilots to which segments of an airspace complex are active. Other military units, including those at Volk ANG field located in Wisconsin, have successfully implemented such frequencies and phone numbers.

AOPA recommends that the managing unit of the Adirondack Airspace Complex be required to use the Federal Aviation Administration (FAA's) Military Airspace Data Entry (MADE) SUA scheduling system. This system ensures that all cooperating agencies have the real-time SUA information, including Automated Flight Service Stations (AFSS).

AOPA appreciates the opportunity to comment and encourages the FAA and the military to consider this proposal collectively with other SUA actions in the Northeast region. If AOPA can be of any assistance, do not hesitate to call the point of contact for this issue, Pete Lehmann, at 301.695.2207.

Sincerely,



Heidi Williams
Director
Air Traffic Services