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Mr. Mark Ward  
Manager, Systems Support Group  
Federal Aviation Administration  
ATO, Eastern Service Area  
Attn: AJO2-E2C.2  
P.O. Box 20636  
Atlanta, GA 30320

Dear Mr. Ward:

**RE: Proposal 07-ASO-039-NR: Proposal to Establish the Bulldog C and E Military Operations Areas (MOAs)**

The Aircraft Owners and Pilots Association (AOPA), representing more than 413,000 general aviation (GA) pilots, including nearly 12,000 in the State of Georgia, opposes the expansion of the Bulldog Military Operations Area (MOA) complex as proposed. AOPA appreciates the mitigation efforts by the United States Air Force (USAF) to allow continued access to Emanuel County Airport (SBO), Millen Airport (2J5), and Burke County Airport (BXG) as proposed. However, AOPA must oppose the proposed floor of 500 feet above ground level for Bulldog C and E based on the impacts to Instrument Flight Rules (IFR) operations on Victor route 70 (V-70).

**Impacts to V-70 when Bulldog C and E MOA's Active**

V-70, which runs northeast to southwest through the proposed Special Use Airspace (SUA), has a minimum enroute altitude (MEA) of 3000 feet mean sea level (msl). V-70 is often the only low-altitude route available for GA aircraft due to weather and icing conditions. The only remaining alternative route options have MEAs of 9000 feet msl or require extensive detours of at least 55 nautical miles around the SUA, adding hundreds of dollars to the cost of the flight.

To adequately address the impacts to V-70, AOPA contends that the USAF must work with the Federal Aviation Administration and adjacent air traffic facility to develop a Letter of Agreement (LOA) allowing GA pilots to access V-70 while the proposed MOA is active.

AOPA appreciates the efforts of the USAF to preserve continued access to SBO, 2J5, and BXG. We look forward to additional mitigation efforts to ensure continued access to V-70 is maintained.

Sincerely,

Pete Lehmann  
Government Analyst  
Air Traffic Services