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March 24, 2008

Mr. Joseph Yadouga  
Manager, System Support Group, AJO-2C2  
Department of Transportation  
Federal Aviation Administration  
2601 Meacham Blvd  
Fort Worth, TX 76137

**RE: Proposal 08-ASW-09-NR: Proposed Revision of De Soto 1 and Establishment of De Soto 3/4 Military Operations Areas (MOAs)**

Dear Mr. Yadouga:

The Aircraft Owners and Pilots Association (AOPA), representing more than 415,000 general aviation (GA) pilots, including nearly 12,000 in the states of Mississippi, Louisiana and Alabama, opposes the expansion of the De Soto Military Operations Area (MOA) complex as proposed by the Air National Guard (ANG). The establishment of the De Soto 3 and 4 MOAs would have a significant negative impact on two Victor Airways, Victor Route 70 (V70) and Victor Route 11 (V11).

**Impacts to V-70 and V-11**

The Times of Use that are listed in the proposal for the De Soto 3 and 4 MOAs is listed as "0830-1730, Monday-Friday, other times by NOTAM" which indicates that the airspace could be activated at any time for any duration. This type of ambiguity does not allow for reasonable Instrument Flight Plan (IFR) route planning creating the potential for flight delays paired with higher costs. V-11 is a major route between Mobile, AL and Jackson, MS and civilian users must be able to plan flights accurately and consistently.

**Nearby Warning Areas Best Alternative**

The activities for use listed in the proposal are "*Military aircraft conducting extensive maneuvers including Close Air Support, Air Combat Maneuvers, and Forward Airborne Controller Training.*" AOPA contends that these types of training and actives could be conducted over water in the existing Warning Areas located less than 50 nm south of the De Soto Airspace Complex, and have little to no impact on the National Airspace System (NAS). This move would also increase the safety of training, as it would significantly reduce the chance of a non-participating aircraft penetrating the boundaries of the training area.

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AOPA is opposed to the proposed expansion because general aviation access to the Victor routes must be maintained. If the MOA expansion moves forward, at a minimum the Air Force should coordinate with the Federal Aviation Administrations (FAA's) Houston Air Route Traffic Control Center (ARTCC) to form a Letter of Agreement (LOA) allowing civil IFR aircraft access to V-70 and V-11 while the MOAs are active.

AOPA appreciates the opportunity to comment on the De Soto MOA proposal. If you have any questions, do not hesitate to contact me at 301-695-2207.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pete Lehmann', with a long horizontal flourish extending to the right.

Pete Lehmann

Manager

Air Traffic Services