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Ms. Edie Parish
Manager, Airspace and Rules Group
Docket Management Facility
U.S. Department of Transportation
Docket Operations, M-30
1200 New Jersey Avenue, SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: FAA Docket No. FAA-2008-0038 and Airspace Docket No. 07-ANM-16

Dear Ms. Parish:

The Aircraft Owners and Pilots Association (AOPA), representing more than 415,000 members, submits the following comments and recommendation in support of the Federal Aviation Administration's (FAA) proposal to establish low altitude area navigation (RNAV) route T-274 in Southwest Oregon (Docket number FAA-2008-0038). These routes were specifically requested by AOPA in January 2007 to allow direct routing between the Oregon coast and points inland.

Establish Lower MEA for T-274

AOPA recommends that the FAA modify its proposal to ensure that T-274 has a lower minimum en route altitude (MEA) than the current Victor airways. Lower MEAs allow pilots to more easily avoid icing conditions, which prevail much of the year in Western Oregon. In order to obtain the lowest MEA possible, the FAA may also consider using communication gaps, a tool that permits aircraft to fly through an area where contact with Air Traffic Control is unavailable. Pilots understand that this may reduce the capacity of the route, but the safety benefit may make it advantageous in this case.

AOPA began advocating for the establishment of charted RNAV airways in 2000 as part of the broad effort to move forward with a benefits-driven transition to RNAV. Strategic use of RNAV airways nationwide will reduce the cost of flying and provide aircraft owners more benefits from their instrument flight rules (IFR)-certified GPS receivers.

AOPA appreciates the FAA's commitment to implementation of RNAV T-Route in the Southwest Oregon area and fully supports the work already in process to expand upon this initiative in other terminal airspace areas.

Sincerely,

Pete Lehmann
Manager
Air Traffic Services