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November 25, 2008

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

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

Dear Mr. Ward:

The Aircraft Owners and Pilots Association (AOPA), representing more than 415,000 general aviation (GA) pilots, including nearly 12,000 in the state of Georgia, submits the following comments to supplement the previous comment submitted, dated January 24, 2008.

As expressed by pilots at the informal public meeting held on October 23, 2008 in Swainsboro, GA, AOPA has significant concerns regarding the Instrument Flight Rules (IFR) access to airports underlying the proposed MOA, when the airspace is active. Many of these operations are revenue generating for not only the operator, but the Fixed Based Operators (FBOs), as well as the surrounding communities.

Any delays in these operations that are the result of the MOAs being active would have a negative economic impact on these operators, FBO's and the surrounding community. The Federal Aviation Administration (FAA) and US Air Force (USAF) have a responsibility to acknowledge these impacts, and mitigate them prior to creating this new airspace.

The FAA and USAF have stated that they plan to utilize a Letter of Agreement (LOA) to facilitate IFR access to the underlying airports while the MOAs are active. It is incumbent upon these two agencies to engage to local users and businesses in the creation of the LOA, to ensure the needs of all users are met, and the economic impacts to businesses are minimized.

AOPA appreciates the efforts of the FAA and USAF to address user concerns on this matter. For any additional information, do not hesitate to contact the undersigned.

Sincerely,

Pete Lehmann  
Manager  
Air Traffic Services