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August 31, 2009

Mr. Tony Wylie, Manager
Alaska Flight Services Information Area Group
Federal Aviation Administration, AAL-530
222 West 7th Avenue #14
Anchorage, AK 99513-7687

Dear Mr. Wylie:

Re: Aeronautical Study No. 08-AAL-22NR, Proposed Delta MOA

The Aircraft Owners and Pilots Association (AOPA), representing more than 415,000 members nationwide, 4,300 of which reside in the state of Alaska, oppose the establishment of the Delta Military Operations Areas as defined in this proposal. Aviation is a key form of transportation that the Alaskan public relies on. While we support military training, the exercises need to be conducted without the loss of Instrument Flight Rule (IFR) access.

The proposal to create the new Delta MOAs removes the only airway remaining that transitions through the Pacific Airspace Complex, an area approximately 320 nautical miles across and at least 100 nautical miles deep, covering some 34,863 square miles. The principle impacts of this proposal to general aviation are:

- Severing the IFR airways between Fairbanks, Delta Junction, Northway and international flights following the Alaska Highway route into Canada, connecting with the lower 48 states. The USAF suggested mitigation of civil IFR traffic cancelling their IFR flight plan, and continuing through the active MOA under VFR is not viable due to significant impact to aviation safety.
- Visual Flight Rules (VFR) traffic is exposed to increased levels of high-speed military traffic along this commonly used route.

Delta MOAs Impact V-444 Access and Limit IFR Traffic

Alaska, at a size of approximately one-fifth of the rest of the nation, relies largely on air travel, with over 200 communities that count on aviation as their sole means of year-around access. The size of the proposed Delta MOAs is approximately 3.5 million acres, slightly larger than the state of Connecticut. The impact of precluding IFR access across an area this size is significant enough in its own right, however when the proposed Delta MOAs are activated, they become contiguous with the remainder of the eastern Alaska MOA complex, an area approximately 22.3 million acres in size, almost as large as the entire state of Indiana. With IFR access not allowed when MOA's are active, this creates a block to civil access to very large areas with no practical means to circumnavigate by most general aviation aircraft.

The proposed Delta MOA's, while only used during major flying exercises, represent a significant interruption for civil traffic. Closing the airspace to IFR travel for up to five hours a day, in ten-day exercise periods, during the business day is a significant impact. Several of these exercise periods fall within the summer travel season when construction projects and seasonal visitor travel, as well as routine transportation between communities takes place. The only alternative IFR route would require a detour of nearly 390 nautical miles, with a minimum enroute altitude (MEA) of 10,000 feet, and two crossings of the Alaska Range. This is not practical or safe for many general aviation aircraft.

Delta MOA Impact on VFR Aircraft

While VFR aircraft are permitted to fly in active MOAs, the corridor of airspace that is now proposed to be converted into the Delta MOA was specifically excluded from the Interior Alaska MOA complex to provide airspace free of high-speed military maneuvers and tactics along this well established travel corridor. The low-level VFR corridors carved out of the bottom of the existing Birch and Buffalo MOAs were designed specifically to provide a safe haven for slow aircraft that either had no radios, or otherwise wished to deconflict by staying below the "fast movers" that used these MOAs. The ceiling of Birch and Buffalo MOAs were designed to allow IFR traffic to transit overhead.

During informal discussions the USAF has suggested that civil IFR aircraft will continue to have access by canceling their IFR clearance, and proceeding VFR via these low level corridors. This type of operation creates a potential reduction in safety for operators and passengers alike, by encouraging faster IFR aircraft to mix with slow VFR aircraft in these low-level corridors that range from 1,000 to 1,500 feet agl, and vary in width considerably. Giving up the safety of altitude, radar and radio coverage to obtain access is a loss of safety, and should be avoided.

AOPA Recommendations for Mitigations

In light of the additional Air Force radar that has been installed, and offered to the FAA, and improved radio communication between IFR aircraft and Anchorage Center, the FAA should establish procedures to avoid a complete closure of V-444. Based on numerous technical meetings with the Air Force, FAA and other civil users, AOPA understands that an altitude floor is used to let emergency traffic through this airspace when needed. Based on this model, AOPA recommends that instead of splitting the airspace horizontally, shown in the current proposal, that the airspace be separated into a low and high MOA along the airway. Procedures should be developed to allow the low MOA (10,000 feet and below) to remain available to civil aircraft, if needed. With the additional surveillance and communication provided by the military, AOPA contends that procedures must be established for real-time coordination of this airspace that accommodates the military training without adversely impacting civil access.

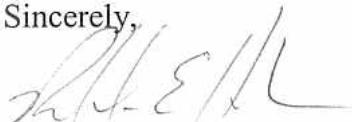
AOPA and the Alaskan aviation community have actively worked with the FAA and Air Force to explore creative solutions for all users of this airspace. From those discussions, innovations such as the Special Use Airspace Information Service (SUAIS) have greatly increased situational awareness for VFR traffic operating in the existing MOA complex. A similar effort is needed to continue uninterrupted access for IFR traffic, while supporting the military's need to train. We

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are anxious to see the data that are being collected by Anchorage Center this summer, to evaluate the impacts to civil and military users in this important piece of airspace.

AOPA appreciates the opportunity to provide input on the impacts associated with the proposed MOAs and looks forward to further coordination efforts between the Alaska aviation community, the FAA and the Air Force to address these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. E. Hackman', written in a cursive style.

Robert E. Hackman
Senior Director
Regulatory Affairs