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October 4, 2010

Mr. Paul Gallant
US Department of Transportation
Docket Operations M-30
1200 New Jersey Avenue, SE
West Building Ground Floor
Room W12-140
Washington, DC 20590-0001

RE: Proposed Revocation of VOR Federal Airway V-284; FAA Docket No. FAA-2010-0813, Airspace
Docket No. 09-AEA-12

Mr. Gallant,

The Aircraft Owners and Pilots Association (AOPA), representing more than 415,000 members nationwide, opposes the Federal Aviation Administration's (FAA) proposed revocation of Very High Frequency Omnidirectional Range (VOR) Federal Airway V-284 over eastern New Jersey based on the lack of demonstrated cost savings and the negative impact on general aviation operators.

In recent discussions with the FAA, it was made clear that there are no ongoing or routine expenses incurred in maintaining an existing Victor Airway. An expense would only be incurred in the unlikely event that a navigational aid (NAVAID) were relocated or the NAVAID equipment was damaged to a point that a flight check is required to verify signal strength and integrity. Neither situation is routine or likely to occur in the near future. The only significant expense in a federal airway is in the development phase and original flight testing; expenses that have already been incurred for V-284. In light of the fact that these costs have already been incurred and data that shows there is continued use of the NAVAID, it does not appear there is justification for this proposed revocation.

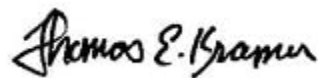
It appears this airspace action was triggered by an individual pilot's request to position an aerobatics box within 4 nautical miles of the existing Federal Airway, V-284. We have learned that even with the revocation of this Victor Airway, FAA approval of the aerobatics box is unlikely because of the congested area that lies under the proposed site. The installation of an aerobatics box, usable by one individual or a very small portion of the general aviation community, should not come at the expense of a Victor Airway available to all certificated pilots.

The revocation of V-284 would reduce the efficiency of operations between the Wildwood, NJ area and southeast Philadelphia, PA. For non-Global Positioning System (GPS) equipped aircraft, VOR navigation via the Federal Airway network remains the primary means of navigation during Instrument Flight Rules (IFR) operations. Under the proposed revocation, pilots could be forced to deviate off their desired course, increasing the time and expense needed to complete their flight.

Mr. Paul Gallant
Page 2
October 4, 2010

Absent a demonstrated, quantifiable cost savings and given the negative impact to general aviation operators, AOPA opposes the revocation of Victor Airway V-284. We appreciate the opportunity to provide comments on this proposed revocation.

Sincerely,

A handwritten signature in black ink that reads "Thomas E. Kramer". The signature is written in a cursive, slightly slanted style.

Thomas E. Kramer
Manager
Air Traffic Services