



421 Aviation Way
Frederick, Maryland 21701

T. 301-695-2000
F. 301-695-2375

www.aopa.org

October 26, 2012

Mr. David P. Medina
Manager, Operations Support Group, AJV-C2
Airspace Study 12-ASW-19-NR
Department of Transportation
Federal Aviation Administration
2601 Meacham Blvd
Fort Worth, TX 76137

Re: Proposed Establishment of Playas Temporary Military Operations Areas, New Mexico

Mr. Medina,

The Aircraft Owners and Pilots Association (AOPA) representing more than 400,000 general aviation members nationwide, submits the following comments in response to the United States Air Force (USAF) request to establish the Playas Temporary Military Operation Area (TMOA) in support of Exercise Angel Thunder in New Mexico. While temporary in nature, the proposed Playas TMOA would require some additional modification to reduce or lessen the impact on instrument flight rules (IFR) and visual flight rules (VFR) general aviation operations. These mitigations would include, coordination with Albuquerque Air Traffic Control Center (ARTCC) to allow them to transition aircraft through the TMOA when possible, and ensuring times of use are adjusted to reflect actual times necessary for training purposes.

Negative impact on multiple IFR routes

The low floor and high ceiling of the proposed Playas TMOA would leave sections of V66, V16, V198 and T-306 unusable. This would inevitably force pilots to circumnavigate a large portion of airspace during activation or seek less efficient routing. To mitigate the impact on these airways, AOPA asks that the Albuquerque ARTCC and the USAF work collaboratively to mitigate the impacts on general aviation pilots. Allowing aircraft operating under IFR to transition through the TMOA instead of having to be routed around the airspace would go great lengths to ensuring minimal impact to operations.

Times of use appear excessive

With a lack of real-time Special Use Airspace (SUA) activation data, general aviation pilots are forced to rely primarily on charted times of use for flight planning. In the interest of being good stewards of the national airspace system and its finite resources, we would ask that the times of use be reduced to only what is needed for training purposes.

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Thank you for the opportunity to submit comments on the proposed establishment of the Playas TMOA in support of exercise Angel Thunder. The coordination between the FAA and the USAF will go a long way in mitigating any impact on the general aviation community.

Sincerely,

A handwritten signature in black ink that reads "Melissa McCaffrey". The signature is written in a cursive style with a large, stylized initial 'M'.

Melissa McCaffrey
Senior Government Analyst
Air Traffic Services