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September 26, 2012

Mr. Gary Norek
U.S. Department of Transportation
Docket Operations, M-30
1200 New Jersey Avenue SE.
West Building Ground Floor, Room W12-140
Washington, DC 20590

Re: Docket No. FAA-2012-0867, Airspace Docket No. 12-AGL-4: Proposed Modification of VOR Federal Airway V-170

Mr. Norek,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) proposal to modify the Very High Frequency Omnidirectional Range (VOR) Federal Airway V-170 in the vicinity of Devils Lake, North Dakota. While AOPA does not oppose this proposal, there are other solutions available that would accomplish the same goal while reducing the negative impact on general aviation flight operations and make use of satellite-based technology.

Permanent Modification, Temporary Situation

According to the Notice of Proposed Rulemaking (NPRM), the FAA is pursuing this airway modification to address a conflict with restricted area R-5402. Recent rulemaking establishing this restricted airspace provides for activation by NOTAM only, with no charted or designated times of use. The modification to V-170 will result in greater track miles for general aviation 100% of the time. A change to V-170 is a permanent modification to a temporary situation. When the restricted airspace is not activated, general aviation pilots will be forced to request more direct and efficient routing since no published route will exist.

Consider Alternative Solutions

Rather than amend V-170, forcing all traffic, both instrument and visual, to circumnavigate special use airspace (SUA) regardless of its activation status, AOPA urges the FAA to consider alternatives. A global positioning system (GPS) waypoint could be established that air traffic controllers could clear instrument flight rules (IFR) aircraft to in lieu of proceeding on V-170. Alternatively, a T-route could be established in addition to the existing Victor airway that maintains appropriate separation from the SUA. The FAA is about to begin an effort to reduce the number of VOR facilities and has already begun replacing some Victor Airways with T-routes. For this reason, a T-route is a longer-term solution that also leverages satellite technology.

AOPA urges the FAA to consider alternative solutions that meet the intended goal of separating IFR traffic from restricted airspace while minimizing the impact on general aviation flight operations. We appreciate the opportunity to submit comments on the proposed modification of V-170.

Sincerely,

Tom Kramer
Manager, Airspace and Modernization