



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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January 25, 2007

Mr. Michael A. Tarr
Federal Aviation Administration
Attn: Alaska Flight Service Information Office, AAL-530
Manager, AFSA Operations Branch, AAL-530
222 West 7th Avenue, #14
Anchorage, AK 99513-7687

Re: Delta Temporary Military Operations Area (MOA); Aeronautical Study 06-AAL-45NR

Dear Mr. Tarr:

The Aircraft Owners and Pilots Association (AOPA), representing nearly 410,000 members nationwide, 4,400 of whom reside in the state of Alaska, oppose the establishment of temporary MOA's in the Delta Junction area. While we support military training, we contend that this exercise needs to be accomplished without impacting access to northern Alaska, the Delta Junction and Ft. Greeley areas.

The current proposal would impact the only Victor airway, V-444, that connects Fairbanks and northern Alaska with Canada and the lower 48-states. V-444 also provides instrument flight rules (IFR) access to Allen Army Airfield serving the Delta Junction and Ft. Greeley areas. The only alternative route would require a detour of nearly 390 nautical miles, with an MEA of 10,000 feet that requires two crossings of the Alaska Range. This is not practical or safe for many general aviation aircraft.

While the United States Air Force (USAF) proposal only indicates a closure of the V-444 for two 2.5-hour blocks per day, it is unclear how Air Traffic Control (ATC) will open and close this airspace, and whether schedule delays or weather may extend this window to a larger timeframe. We have been told that ATC will have no other choice but to route aircraft along the alternative route requiring pilots to deviate nearly 390 miles, which is an unacceptable situation.

Despite the temporary nature of this MOA establishment, the language in the proposal clearly states the current airspace configuration is no longer adequate to meet the USAF's training needs. In fact, the Air Force has already briefed us on plans to establish a permanent MOA in this area. Consequently, this proposal needs more careful consideration by all parties concerned prior to implementation of a temporary or permanent MOA.

The infrastructure that the USAF has in place appears to provide the tools necessary to provide real-time coordination with ATC. Based on briefings from the military, the actual usage of the MOA airspace near the IFR routes is only a few minutes at a time. Through real-time coordination, the impact to civilian IFR traffic using those airways could be significantly reduced. Given the lack of viable alternative routes, a commitment by the Air Force and FAA needs to be made before reducing access in the IFR system.

Mr. Michael A. Tarr
Page 2
January 25, 2007

Over the past decade, the USAF, the Federal Aviation Administration (FAA) and the civil aviation community have implemented innovative solutions enabling real-time special use airspace (SUA) information for the massive MOA complex that currently dominates central and eastern Alaska. The development of the Special Use Airspace Information Service (SUAIS), combined with Very High Frequency (VHF) radio coverage, radar, and Eielson Range Control now provide excellent tools to de-conflict civil and military traffic operating under visual flight rules. This same resource should be utilized and considered a necessary resource in any future SUA airspace proposals.

AOPA appreciates the opportunity to provide input on the impacts of this proposed temporary MOA and looks forward to further coordination efforts between the FAA and the USAF to reduce the impacts of a MOA in the Delta Junction area.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams", with a long horizontal flourish extending to the right.

Heidi J. Williams
Director
Air Traffic Services

cc: Mr. James W. Hostman, Elmendorf AFB, AK