



**AIRCRAFT OWNERS AND PILOTS ASSOCIATION**

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June 6, 2007

Ms. Edith V. Parish  
Manager, Airspace and Rules Group  
Docket Management System  
U.S. Department of Transportation  
400 Seventh Street, SW, Room Plaza 401  
Washington, DC 20590-0001

**Re: No. FAA-2007-27332 and Airspace Docket No. 07-AWP-2**

Dear Ms. Parish:

The Aircraft Owners and Pilots Association (AOPA), representing more than 412,000 members, submits the following comments with regards to the establishment of low altitude area navigation (RNAV) routes T-245, T-247, and T-249, in the Los Angeles area, as proposed in Federal Aviation Administration (FAA) Docket number FAA-2007-27332.

AOPA began advocating for the establishment and charting of RNAV routes back in 2000, as part of the broad efforts to move forward with a benefits-driven transition to RNAV. Strategic use of RNAV airways nationwide will reduce the cost of flying and provide aircraft owners more benefits from their Instrument Flight Rules (IFR) certified GPS receivers.

Since T-Routes are not reliant on ground-based navigational aids such as VHF Omnidirectional Range (VORs), it is unnecessary for a T-Route to begin or end at a ground-based navigational aid. Rather than the creation of T-route segments that would overlay V23-165, AOPA contends that the proposed Los Angeles T-routes could all originate at POPPR intersection.

AOPA appreciates the FAA's commitment to implementation of RNAV T-Routes in the Los Angeles area and fully supports the work already in process to expand upon this initiative in other terminal airspace areas.

Sincerely,

Heidi J. Williams  
Director  
Air Traffic Services