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April 16, 2012

Ms. Melinda George  
Federal Aviation Administration  
Eastern Service Center  
Operations Support Group (AJV-E2)  
Non Rule Case No. 12-ASO-002-NR  
P.O. Box 20636  
Atlanta, GA 30320

Re: Aeronautical Study 12-ASO-002-NR, Proposed Decommissioning of DECATUR VOR/DME

Ms. George,

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) proposed decommissioning of the DECATUR (DCU) Very High Frequency Omnidirectional Range & Distance Measuring Equipment (VOR/DME) facility located in Decatur, AL. Due to the impact to general aviation flight operations, AOPA objects to the decommissioning of this Navigational Aid (NAVAID). Prior to consideration for decommissioning, the FAA should develop alternate procedures and facilities (including a Remote Communication Outlet) that can replace those procedures and services that would be eliminated by the decommissioning.

The DECATUR VOR is used for numerous instrument procedures including 12 Instrument Approach Procedures, 2 Standard Instrument Departures, 15 Standard Terminal Arrival Routes, 2 Victor airways, 4 holding patterns, 28 airway fixes, and 5 airports. The loss of these procedures will impact not only instrument flight rules operations, but pilots operating under visual flight rules who utilize these procedures for training, practice, and proficiency.

AOPA supports the navigation transition from ground based to a satellite based system. However, that transition to a performance based navigation system must occur without a loss of access to our nation's airports and airway system. Without replacement facilities or procedures, the magnitude of impact caused by this decommissioning is too great and would substantially degrade the efficiency and availability of instrument procedures in the region. While we appreciate the FAA's effort to reduce expenses, general aviation cannot afford to lose critical, all-weather, enroute, and terminal access in the National Airspace System. AOPA requests that the FAA withdraw its proposal to decommission the DCU VOR/DME until affected procedures are amended for use with an alternate VOR.

We appreciate the opportunity to submit comments on this proposed decommissioning.

Sincerely,

Tom Kramer  
Manager  
Airspace and Modernization