



421 Aviation Way
Frederick, Maryland 21701

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

www.aopa.org

May 15, 2012

Mr. David P. Medina
Manager, Operations Support Group, AJV-C2
Airspace Study 12-ACE-8NR
Department of Transportation
Federal Aviation Administration
2601 Meacham Blvd
Fort Worth, TX 76137

RE: Proposed Establishment of Hawki Temporary Military Operations Area, Western Iowa,
Airspace Study 12-ACE-8NR

Dear Mr. Medina,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the United States Air force (USAF) request to establish the Hawki Temporary Military Operation Area (TMOA) underneath the existing CRYPT MOA complex in western Iowa. While temporary in nature, the proposed Hawki TMOA would require some additional mitigation to reduce or mitigate the impact on both visual flight rules (VFR) and instrument flight rules (IFR) general aviation operations.

Impact on Victor Airways

The proposed Hawki TMOA would impact five victor airways, including two that would be entirely unusable during activation of the TMOA. Private pilots, Life Flight helicopters, small charter companies, freight companies, flight schools, as well as small businesses that operate aircraft all have the potential to be adversely impacted. Where there is an increase in flight time due to extended routing around the TMOA, there most certainly is an increase in the cost of operation.

To mitigate the impact on these airways, AOPA requests that the Minneapolis St. Paul Air Traffic Control Center (ARTCC) and the USAF work collaboratively to lessen the impacts on general aviation pilots operating IFR on these airways by allowing the transition through the TMOA when possible.

Mr. David P. Medina

Page 2

May 15, 2012

Scheduled Airshow during Proposed TMOA

The Iowa Aviation Promotion Group (IAPG) has scheduled their annual FLY IOWA airshow in Atlantic, IA, for Saturday, September 15, 2012. This non-profit organization has planned a full day of aviation-related events including an air show and other related activities. This event is critical to IAPG's future as it serves as a platform for their worthy efforts. AOPA requests that the USAF work with the IAPG to alleviate any issues that may arise due to the conflicting times of use and consider ceasing operations during the event.

Lack of Radar Coverage in Area

AOPA members report lengthy amended routing due to lack of radar coverage below 4,000 feet in the area covered by the proposed TMOA. As such, IFR pilots familiar with the area typically request altitudes above 4,000 feet to maintain radar coverage. With the proposed floor at 4,500 feet, pilots operating under IFR would have insufficient altitude to fly below the airspace. AOPA requests that the floor of the proposed TMOA be raised to 6,000 feet to allow for bi-directional IFR aircraft. Should this prove non-feasible, AOPA would suggest the USAF and controlling agency collaborate to cap TMOA operations when IFR traffic is transitioning through the airspace.

Summary

AOPA understands the mission conducted during Operational Readiness Exercises is critical to ensuring the military is able to adequately train. The coordination between the FAA and the USAF will go a long way in mitigating any impact on the general aviation community and we appreciate all efforts to assist as able. Please contact me with questions.

Sincerely,



Sr. Government Analyst
Air Traffic