



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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December 2, 2004

J. Mark Reeves
Federal Aviation Administration
Central Terminal Operations
Manager, Airspace Branch, AGL-520
Room 247
2300 East Devon Avenue
Des Plains, IL 60018

RE: FAA Airspace Case Number 04-AGL-63-NR

Dear Mr. Reeves;

The Aircraft Owners and Pilots Association (AOPA), representing over 400,000 general aviation pilots, submits the following comments in response to the Racer A/B/C/D Military Operations Area (MOA) and the JPG A/B/C/D MOA proposals associated with the Atterbury and Jefferson bombing ranges in Southern Indiana. AOPA opposes the floor of the JPG A and Racer A MOAs as currently proposed at 500 feet Above Ground Level (AGL) in light of the significant negative impact on Visual Flight Rules (VFR) traffic transiting the area and Instrument Flight Rules (IFR) traffic operating to and from Freeman Municipal Airport (SER), North Vernon Airport (OVO), and Madison Municipal Airport (IMS).

JPG MOA Proposal

AOPA recognizes the training objective of the Indiana Air National Guard to maintain a combat mission ready force. However, due to the 500 feet AGL floor of the proposed JPG A MOA, VFR traffic transiting this airspace area will be inclined to circumnavigate a MOA and R-3403A/B footprint nearly 40 NM long and 10 NM wide. AOPA's 2003 Policy and Issue Survey of its members shows that a full 73% of the general aviation pilot population deviates around MOAs, in part because of the inability to get accurate "real-time" status information on that airspace. In fact, our members ranked the ability to receive "real-time" status of Special Use Airspace (SUA) as its second most important airspace issue facing general aviation. Deviations around this large JPG complex will more than double flying time and in turn economically impact operators who are forced to more than double operating costs to avoid the airspace area.

All aircraft transitioning between Indianapolis and Louisville on V51 will be restricted below FL180 when the JPG A and B MOAs are active, thus eliminating access to a prominent VFR and IFR airway. The only other Victor airway connecting Indianapolis and Louisville is V53 with a Minimum Enroute Altitude (MEA) of 10,000 feet Mean Sea Level (MSL), which is near the operational ceiling limit of a number of General Aviation aircraft transitioning the area. Implementing the JPG A MOA would exclude aircraft movement in a considerable portion of airspace between Indianapolis and Louisville. Furthermore, there are multiple privately owned airports underlying the JPG A MOA whose traffic pattern altitudes and operations would all be substantially impacted.

When JPG A MOA is active, nonparticipating IFR traffic would be unable to request Instrument Approach Procedures (IAP) which transition through or pass within 3-miles of the MOA boundary. When the JPG A MOA is active, users of Freeman Municipal Airport (SER) will be unable to fly a total of four IAPs, which includes an Instrument Landing System (ILS) approach scheduled for activation this summer. Without prior coordination between the FAA and military Air Traffic Control (ATC) facilities or raising the ceiling to accommodate users, MOA activation will result in a complete and unacceptable lack of access for IFR traffic. In addition, the missed approach procedure for one approach at Madison Municipal Airport (IMS) would be affected when the JPG A MOA is active, further eliminating IFR access to a public-use airport.

AOPA Recommendation for Mitigation

AOPA strongly recommends the floor of the proposed JPG A MOA be raised to 3,500ft MSL to allow VFR and IFR aircraft to transit this large footprint of airspace below the MOA floor. Amending the proposed JPG A MOA to mitigate the transitory impacts to both VFR and IFR traffic in route to nearby airports significantly lessens the impacts of this proposal on the General Aviation community while maintaining both IFR and VFR access to multiple airports. With mitigation designed into the proposal to maintain accessibility to the airspace, the remaining MOAs in the current proposal would pose far fewer impacts on General Aviation.

Racer MOA Proposal

The proposed Racer and JPG MOAs in combination create significant negative impacts on VFR aircraft transitioning through Southeastern Indiana. The 500 feet AGL floor of both the Racer A and JPG A MOAs in conjunction with lengthy activation periods create a massive complex of SUA pilots will be inclined to avoid or transit around. All aircraft operating VFR in this area along V53 will be forced to transition the area at 8,000 feet MSL or above to deviate around the entire footprint of both the Racer A and JPG A MOA. However, raising the floor of the JPG A MOA to 3,500 feet MSL would allow VFR and IFR access under the proposed SUA complex while significantly mitigating the negative impacts the proposed eight MOAs would impose on aircraft transitioning the area.

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The proposal indicated the times of use for the Racer and JPG MOA complex to be between 0700 or 0800 until 2200 or 2300 local most days of the year. However, an addendum to the March 2001 Environmental Assessment (EA) completed in August of 2004 stated that the average period of time a proposed MOA would be used by aircraft in a 24-hour period is 55 minutes per day. This discrepancy between charted and actual use combined with the lack of specific usage detail further solidifies the need for real-time reporting of SUA activity. Real-time reporting of SUA activity is extremely beneficial to general aviation pilots and greatly aids in pilot flight planning.

General Aviation would be negatively impacted considering the large area of the proposed SUA combined with the extensive charted times of use. This proposal would greatly reduce the efficiency and effectiveness of IFR and VFR travel in an area used heavily by general aviation and limit any growth potential in the Southern Indiana Region.

AOPA appreciates the opportunity to comment on the proposal and looks forward to working with the United States Air Force to help mitigate the transient issues related to the SUA proposal.

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
Manager
Air Traffic, Regulatory & Certification Policy