



## AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798  
Telephone (301) 695-2000 • Fax (301) 695-2375  
www.aopa.org

---

May 31, 2005

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

RE: FAA Airspace Case Number 05-AGL-018-NR

Dear Mr. Reeves:

The Aircraft Owners and Pilots Association (AOPA), representing over 404,000 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 supports and appreciates the cooperation and collaboration with the local airspace users to help mitigate many of the negative impacts to local Visual Flight Rules (VFR) traffic and Instrument Flight Rules (IFR) traffic operating to and from Freeman Municipal Airport (SER), North Vernon Airport (OVO), and Madison Municipal Airport (IMS). However, AOPA remains concerned with the overall impacts that such a large Special Use Airspace MOA complex will have on transient traffic as well as the impacts of the JPG A MOA floor at 500 feet Above Ground Level (AGL) and the associated impacts on two prominent Victor Airways running between Indianapolis, IN and Louisville, KY.

### **JPG MOA Proposal**

AOPA supports the modification of the southwest portion of the JPG A MOA, which raises the floor to 4,000 feet mean sea level (MSL) from 500 feet AGL as originally proposed. The raised floor will release the airspace below the MOA to aviation activities such as Instrument Approach Procedures (IAP) into SER and VFR transitions below the MOA. The previous MOA proposal would have eliminated all access to the IAPs into SER when the airspace was active.

AOPA strongly recommends that the boundary between the northeast and southwest JPG A MOAs be modified to align with Interstate 65, which runs north and south from SER. Using an easily identifiable landmark, such as a major interstate highway, as the boundary for the two MOAs will give pilots a clear visual reference to identify the MOA boundary in day and night VFR conditions when the airspace is most likely to be active.

Mr. Reeves  
Page 2  
May 31, 2005

Furthermore, moving the JPG A MOA boundary 3.5 NM to the east over I65 will permit category A, B, and C aircraft to fly the published missed approach procedure planned for the new instrument landing system (ILS) approach to Runway 05 at SER. Aircraft access to the airspace is needed to initiate the climbing right turn enroute to the published holding pattern at the Captain non-directional beacon (NDB). The current northeast JPG A MOA will encroach on the planned missed approach procedure and limit access to the ILS approach procedure when the MOA is active.

According to an April 21, 2005, memorandum from the Indiana Air National Guard the JPG A and D MOAs will not be activated below 4,000 feet MSL when instrument meteorological conditions prevail in these MOAs. AOPA recommends renaming the portion of the proposed JPG A MOA between 500 feet AGL and up to but not including 4,000 feet MSL to be called "JPG E MOA." Dividing the proposed JPG A MOA into two separately named and defined MOAs will allow the proposed SUA complex to be managed more efficiently and allow pilots to easily define the MOA boundaries.

While AOPA recognizes the amended proposal presents fewer impacts on local general aviation, the modified proposal does not mitigate the negative impacts on aircraft transitioning between Indianapolis and Louisville on V51. IFR flights navigating on the Victor airway will be restricted below FL180 when the JPG A and B MOA's are active, thus eliminating access to this prominent airway. The only other Victor airway connecting Indianapolis and Louisville is V53 with a Minimum Enroute Altitude (MEA) of 10,000 feet MSL, which is near the operational ceiling limit of a number of general aviation aircraft transitioning the area. Implementing the northeast JPG A MOA will continue to exclude aircraft movement in a considerable portion of airspace between Indianapolis and Louisville.

### **Racer MOA Proposal**

AOPA supports the boundary modification of the Racer A and B MOAs, which moves the southern boundaries of the MOAs eight nautical miles (NM) to the north and reduces the size of the lower Racer A MOA by nearly 61 square miles. The reduction in size of the MOAs will mitigate the impacts the original proposal would have imposed on aircraft transitioning to and from airports east of the Racer MOAs.

The modified Racer and JPG MOA proposals continue to negatively impact all aircraft transitioning through Southeastern Indiana. The combined effect of the 500 feet AGL floor of both the Racer A and the northeast JPG A MOAs in conjunction with lengthy planned activation periods, creates a SUA complex that VFR pilots will likely avoid and IFR pilots be forced to 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.

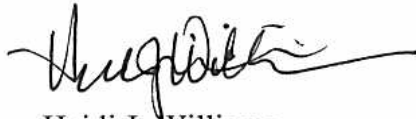
Mr. Reeves  
Page 3  
May 31, 2005

To mitigate the combined effects of the Racer and JPG MOA areas, AOPA strongly recommends the two MOA complexes not be active simultaneously. Limiting simultaneous activation rather than all nine MOAs being activate at once will significantly mitigate the impacts the proposed SUA complex would impose on aircraft transitioning the area.

AOPA applauds the Indiana Air National Guard for actively working to mitigate the concerns of the local flying community through local outreach. The modified proposal is an excellent example of the positive results that arise from sponsor and user group interaction.

AOPA appreciates the FAA circularizing the modified proposal and providing the public with the opportunity to comment on the revised proposal. AOPA looks forward to the Air Force's continued collaborative efforts on airspace initiatives with the users through early local outreach.

Sincerely,

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

Heidi J. Williams  
Director  
Air Traffic, Regulatory & Certification Policy