



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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May 22, 2006

Mark Ward
Manager, Airspace and Procedures Branch
Eastern En Route and Oceanic Area Office
Federal Aviation Administration
Non Rule Case No 06-ASO-056-NR, -054-NR, -055-NR, -0011-NR
P.O. Box 20636
Atlanta, Georgia 30320

Dear Mr. Ward:

The Aircraft Owners and Pilots Association (AOPA), representing more than 33,000 pilots in Florida and more than 408,000 nationwide, opposes the decommissioning of the Palm Beach Very High Frequency Omni-Directional Range Tactical Air Navigation Aid (VORTAC), Fort Lauderdale Very High Frequency Omni-Directional Range and Distance Measuring Equipment (VOR/DME), Cypress VOR/DME, and Punta Gorda VOR. These VOR's should be retained due to their importance in supporting both Visual Flight Rules (VFR) and Instrument Flight Rules (IFR) operations.

Retaining these critical VORs is consistent with Department of Transportation (DOT) policy regarding ground based navigation. Despite the FAA's plans to transition to Global Positioning System (GPS) for navigation, a full network of VORs is still necessary according to the DOT. In fact, according to the DOT's Federal Radionavigation Plan, a reduction in VOR is not expected until at least 2010. These decommissionings conflict with current DOT policy.

Equipage with VOR is extremely high, and the only viable backup option at this time. And, current FAA authorizations for using GPS do not permit its use without a ground based backup capability onboard the aircraft. In addition to the vital role VOR's have in providing a backup, AOPA identified significant adverse impacts on general aviation operations:

- Loss of air / ground communications with Flight Service Stations
- Loss of vital over-water navigation aids (navaids)
- Loss of all ground based instrument approaches at certain airports, virtually mandating GPS
- Loss of navaids that enable pilots to abide by strict U.S. Customs and Border Patrol (CBP) requirements.

Based on AOPA's research, the following impacts have been identified for each of the VOR's proposed for decommissioning:

Palm Beach VORTAC

The Palm Beach VORTAC provides extremely important navigation guidance for pilots flying VFR to and from the Bahamas. Without this important tool, pilots flying without GPS would be unable to effectively comply with certain CBP requirements. In addition, communication with the Miami AFSS is available through the VORTAC, with no viable replacement in the vicinity. Of the eight Victor Airways associated with VORTAC, four provide vital navigation routes to the Bahamas. In all, nine instrument approaches depend on the Palm Beach VORTAC for direct azimuth information, missed approach guidance, or fix information.

Fort Lauderdale VOR/DME

Pilots flying VFR to and from the Bahamas depend on the Fort Lauderdale VOR/DME for critical navigation information and would be unable to comply with certain CBP requirements unless operating with GPS. Four Victor Airways are based on the Fort Lauderdale VOR/DME, three of which provide vital navigation to the Bahamas and the VOR/DME provides navigation and missed approach information for five instrument approach procedures into Fort Lauderdale International (FLL).

Cypress VOR/DME

The Cypress VOR/DME, located at the Naples (APF) airport in southwest Florida, provides the only ground-based instrument access to APF. Without the VOR/DME, pilots operating under IFR into Naples cannot access the airport unless GPS equipped. This VOR decommissioning results in mandatory equipage for continued access. In addition to the three instrument approaches served by the VOR/DME, one low altitude airway across the Gulf of Mexico, Q102, depends on the VOR/DME.

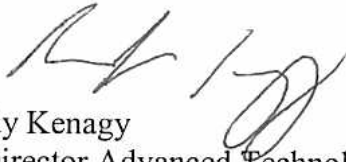
Punta Gorda VOR

The Punta Gorda VOR provides one of the area's only lines of communication to the St. Petersburg AFSS, a service general aviation pilots depend on for airborne weather and Notice to Airman (NOTAM) information. Similar to the Cypress VOR/DME, the Punta Gorda VOR also provides the only ground-based instrument access to the Charlotte County airport (PGD), virtually mandating GPS equipage for continued access.

Mr. Mark Ward
Page 3
May 22, 2006

The decommissioning of four VOR's within a 200-mile radius is unwise and unacceptable. Based on the information that AOPA has provided, the FAA should retain these VORs. AOPA appreciates the opportunity to comment on these important VOR decommissioning cases. If you have any questions, please contact me at 301-695-2211.

Sincerely,

A handwritten signature in black ink, appearing to read 'Randy Kenagy', written over a light blue horizontal line.

Randy Kenagy
Sr. Director Advanced Technology
Regulatory Policy