

May 10, 2015

Department of Transportation
Federal Aviation Administration
Operations Support Group, Western Service Center
Attn: Michele Cruz
1601 Lind Ave S.W.
Renton, WA 98057
7-ANM-OSG-Public-Notice-Inbox@faa.gov

Re: AMENDED NOTICE OF PROPOSAL TO MODIFY, EXPAND AND ESTABLISH SPECIAL USE AIRSPACE JOINT PACIFIC ALASKA RANGE COMPLEX JOINT BASE ELMENDORF-RICHARDSON, ALASKA STUDY #14-AAL-22NR

The National Business Aviation Association (NBAA) represents the interests of more than 10,000 Member companies who operate general aviation aircraft as a solution to some of their business travel needs. Over NBAA's 66-year history, the Association and our Membership have been active participants in the development, analysis and implementation of numerous regulatory and airspace initiatives that have impacted the business aviation community. We believe that this involvement has helped to produce sound and effective safety policy related to the operation aviation aircraft in the National Airspace System (NAS).

The business aviation community has a long and demonstrated history of partnership with government safety agencies. These partnerships are based on common objectives and underscore our preference for working cooperatively with these agencies to jointly develop solutions. NBAA member companies operate in a variety of operational environments in Alaska. We have members operating both VFR low level and IFR at higher altitudes in support of various business needs in Alaska.

It is in that spirit that the NBAA offers these comments on the FAA's proposed requirements for modification of SUA under STUDY #14-AAL-22NR.

NBAA has three areas of concern with this proposal:

1. The lowering of the floor of the Fox MOA from 5000 to 500 feet AGL is a concern will result in compression of VFR traffic that is potentially unsafe and FAA should consider this in its final decision.
2. NBAA requests that Special Use Airspace Information Service (SUAIS) be expanded to include all of the proposed MOAs and that SUIAS coverage be a condition of the lower altitudes MOA's being activated.
3. As for the proposed MOAs that will be active 240 days a year with an average of 12 hours/day (NOT DURING LFEs), NBAA requests that non-participating IFR traffic be given priority for transit through the MOA as the AF has done recently with the Powder River Training Complex.

NBAA appreciates the opportunity to provide comments on this proposal.

Regards,



Robert G. Lamond Jr.
Director, Air Traffic Services & Infrastructure