



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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FAA-03-14305-8

March 5, 2003

Docket Management System
U.S. Department of Transportation
Room PL 401
400 Seventh Street, SW.
Washington, DC 20590-0001

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DEPT. OF TRANSPORTATION
DOCKETS

RE: FAA-2003-14305; Special Operating Rules for the Conduct of IFR RNAV Operations using GPS in Alaska

To Whom It May Concern:

The Aircraft Owners and Pilots Association (AOPA), on behalf of over 390,000 general aviation pilots nationwide, supports the establishment of Special Federal Aviation Regulation (SFAR) 97, allowing the use of Global Positioning System/Wide Area Augmentation Systems (GPS/WAAS) for the en route portion of flights on routes in Alaska.

For nearly four years, AOPA has been advocating for the establishment of charted RNAV routes. Charting of such routes enables increased access for general aviation pilots to transition airspace in the en route environment with increased efficiency. In addition to increased efficiency, the establishment of RNAV airways facilitates lower minimums on victor airways where ground based NAVAID performance gaps affect minimum altitudes. SFAR 97 also allows for continued use of existing airways where the NAVAID signal is no longer suitable for en route navigation.

SFAR 97 would also facilitate further development of the AOPA-supported Capstone Program, which uses current-day technology to increase capacity while improving safety. Allowing the use of Global Positioning System/Wide Area Augmentation Systems (GPS/WAAS) for the en route portion of flights on routes in Alaska will further reduce the chances for controlled flight into terrain and midair collisions while at the same time improving capacity.

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AOPA appreciates the efforts being made by the FAA to increase safety, efficiency and capacity in the state of Alaska. Implementation of SFAR 97 will result in improvements to safety and efficiency in this general aviation-dependent state.

Respectfully,

A handwritten signature in black ink, appearing to read "Heidi J. Williams". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Heidi J. Williams
Manager
Air Traffic, Regulatory and Certification Policy