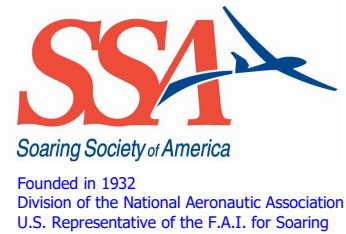


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Richard Farnsworth  
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Federal Aviation Administration  
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October 16, 2019

**Re: Aeronautical Study Number: 19-AWP-14NR (Walker MOA)**

The Soaring Society of America (SSA) is an organization with approximately 10,000 members which was created in 1932 to foster and promote all phases of gliding and soaring. The Society and its affiliates are involved in safety programs and flight training, technological research and development, and representation to Federal agencies. In this capacity, the SSA has discussed airspace issues with the FAA and NTSB, including commenting on various Federal proposals, over several decades. The SSA submits the following response to the referenced airspace proposal.

The SSA notes that while the proposed MOA appears to be located in a lightly used aircraft traffic area, there is regularly substantial glider activity through this corridor. Gliders flying from several possible glider operations in the California/Nevada area may encounter either thermal “streets” and/or mountain wave conditions that facilitate their operation through the proposed MOA. They may be doing so while attempting FAI badge or record flights, or while flying in organized glider (soaring) events. It is common for these flights to be conducted along the Sierra Mountains through the proposed MOA. Examples of such flights (often exceeding five hours in duration) are obtainable online at: [www.ssa.org/olc](http://www.ssa.org/olc) and can be accessed using the online contest (OLC) link to flights made from various soaring operations. As an aside, a National Glider Championship is scheduled in Minden, NV in June, 2020. Typical task calls during past Championships held there have included legs through the proposed MOA, with up to 70 aircraft participating.

The SSA is concerned that the MOA sponsor may be relying on the “protection” of ATC in avoiding civilian aircraft transiting through the area. While most aircraft operating in the MOA will be flying under positive control, gliders are exempt from certain reporting and ATC contact requirements up to the floor of Class A airspace (18,000 ft MSL). Most gliders operating in this area will be carrying transponders, however they are not required to do so. They will be operating under daytime VFR rules and will not necessarily be in contact with ATC and be receiving traffic advisories. Instead, they may be operating on a glider specific air-to-air radio frequency. Military pilots operating in the MOA should be advised that gliders regularly operate in the MOA and may not be tracked by ATC.

While many gliders are equipped with PCAS-like devices which can detect transponder and ADS-B equipped aircraft near them, the FAA has recently exempted certain military aircraft from operating with these devices active (Docket No.: FAA–2019–0562). The SSA also notes that the proposed MOA is in an area where transponders may be interrogated only intermittently. All of these issues increase the potential for conflict.

Most glider pilots check weather and NOTAMs in the morning hours. When glider events are held there is typically a pilot briefing at 10AM. The gliders may not be on course until a couple hours after the briefing and may not transit through a given area until several hours later, often landing after 6PM. Given the typical briefing-to-area-transit time and the duration of glider flights, the proposed four-hour MOA notification time will be problematic for glider pilots. The SSA believes that a twelve-hour notification interval for daytime operations is more appropriate given the circumstance and believes that increasing the requirement should present no additional burden to the MOA sponsor.

A further point is that gliders exhibit unique in-flight characteristics. Glider pilots do not necessarily fly straight courses; they may fly non-linear flight paths, often abruptly stopping to circle or even change direction. Military pilots operating in and near this MOA need to be aware of this.

The SSA has concerns that concurrent Military and glider operations in the proposed MOA have the potential for conflict. These concerns may be mitigated by providing adequate notification to the aviating public, educating Military pilots on the unique operational characteristics of the aircraft they may encounter, and by limiting Military use of the MOA in the afternoons and early evenings when glider traffic is most likely to be encountered.

Regards,

/signature/

Stephen Northcraft, Chairman  
Government Liaison Committee  
Soaring Society of America

ADS-B	Automatic Dependent Surveillance-Broadcast
ATC	Air Traffic Control
FAA	Federal Aviation Administration
FAI	Fédération Aéronautique Internationale
MOA	Military Operating Area
NOTAMs	Notices to Airman
NTSB	National Transportation Safety Board
OLC	Online Contest
PCAS	Portable Collision Avoidance System
SSA	Soaring Society of America