October 3, 2011

Mr. Renton S. P. Bean
Aircraft Certification Service, Aircraft Engineering Division (AIR-103)
Federal Aviation Administration
950 L'Enfant Plaza, 5th Floor, SW
Washington, DC 20024

RE: **SOP#: AIR -100-001; STANDARD OPERATING PROCEDURE – AIRCRAFT CERTIFICATION SERVICE PROJECT SEQUENCING**

Dear Mr. Bean:

The National Air Transportation Association (NATA), the voice of aviation business, is the public policy group representing the interests of aviation businesses before the Congress, federal agencies and state governments. NATA's over 2,000 member companies own, operate and service aircraft and provide for the needs of the traveling public by offering services and products to aircraft operators and others such as fuel sales, aircraft maintenance, parts sales, storage, rental, airline servicing, flight training, Part 135 on-demand air charter, fractional aircraft program management and scheduled commuter operations in smaller aircraft. NATA members are a vital link in the aviation industry providing services to the general public, airlines, general aviation and the military.

In this Standard Operating Procedure (SOP), the Federal Aviation Administration (FAA) explains the process used to sequence certification projects: *"All applications for new certification and validation projects requiring more than 40 hours of dedicated FAA work effort are prioritized, on a national basis, based primarily on the project's impact on safety and availability of resources."*

NATA INTEREST IN THIS STANDARD OPERATING PROCEDURE
While this SOP has been implemented to increase the efficiency of the Aircraft Certification Service (AIR) and alleviate the strain on the FAA's limited resources, the project sequencing process still renders significant delays to applications for certification/validation. These delays will continue to affect economic growth and efficiency of the aviation industry. The AIR's certification backlog not only affects the financial aspect of the industry but also impacts the improvement of safety as the industry's utilization of new initiatives and advanced technology is delayed.

With regard to this SOP, NATA offers general comments and recommendations on the AIR's project sequencing process.

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It is important for the FAA to provide adequate, timely and consistent support to the aircraft certification process. NATA believes various factors have play in the delays of the aircraft certification process. There has been inconsistent interpretation of rules, standards, and policies between FAA offices, which at times creates a deadlock in the process as offices try to determine how to proceed. The project sequencing process gives inadequate access, especially to small business owners. Some methods used in project sequencing are wasteful.

NATA requests that the FAA form an advisory committee to conduct an analysis and evaluation of the AIR process to identify and eliminate waste and recommend effective changes to optimize the work flow of project certification. It's recommended that the FAA develop and implement a system to track delays and wait-listing of applications and the reasons for delays in order to communicate submission status better to applicants. A timeline for response should also be developed for better communication with applicants when they are being delayed.

New aircraft technology and modifications that are being developed for aircraft improve the overall safety of the aviation industry and raise the standard of safety not only in the United States but also globally.

Aviation has been one of the country's key contributors to the gross economy. The U.S. aviation/aerospace manufacturing industry has held a competitive edge across the globe. Delaying these projects will only put America at a competitive disadvantage in the future.

CLOSING
NATA is an advocate of the general aviation industry and its partners that aid in enhancing the safety and growth of the industry. The AIR plays a vital role in advancing new innovations, parts, and aircraft that propel the industry to greater heights. However, there are significant challenges within the project sequencing process that must be addressed. We believe that, with a detailed investigation and evaluation of the process, the FAA will be able to identify the bottlenecks and implement corrective actions to get the process flowing.

Sincerely,

Eric R. Byer
Vice President, Government and Industry Affairs