

February 3, 2014

Mr. James Viola
Manager, General Aviation and Commercial Division AFS-800
Orville Wright Bldg. (FOB10A)
800 Independence Ave SW
Washington, DC 20591
Delivered electronically via www.regulations.gov

RE: DOCKET NO. FAA-2013-0809; NOTICE OF POLICY CHANGE FOR THE USE OF
FAA APPROVED TRAINING DEVICES

Dear Mr. Viola:

The National Air Transportation Association (NATA), the voice of aviation business, is the public policy group representing the interests of aviation businesses before Congress, federal agencies and state governments. NATA's member companies own, operate, and service aircraft. These companies 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.

NATA is concerned that the FAA Policy Change for the Use of FAA Approved Training Devices will adversely affect the operations of flight schools including the quality of flight training. Flight simulators are an invaluable tool in flight training in that they expose pilots to a variety of training scenarios not encountered while training in an airplane leaving them better prepared for unexpected situations. The technology used in Flight Training Devices is constantly advancing, creating safer and more proficient pilots. NATA believes we need to take advantage of the benefits of flight simulator training and encourage rather than discourage its use. The policy change will lead to a regression in the quality of flight training by limiting the amount of time that can be credited in a flight simulator. Furthermore, the overall cost of flight training will

increase because flight students will need to supplement the additional training hours in an airplane rather than a flight simulator.

In addition, many Part 141 flight training providers will struggle to update their training courses and seek re-approval by the FAA while maintaining business operations. Flight students who have already begun their training may not be able to complete their course by the January 2015 deadline, forfeiting their training in a flight training device.

For this reason, NATA encourages the FAA to delay the January 2015 deadline for implementation of the policy while expedited rulemaking is undertaken to allow more simulator time to be credited towards a rating. Specifically, the rule should recognize the value of modern training devices and encourage maximum utilization. NATA and our members would like to work with the FAA and others in industry to inform the rulemaking process and articulate the importance of flight training devices in training safe pilots.

Sincerely,

A handwritten signature in cursive script, appearing to read "Collin Smith".

Collin Smith
Manager, Regulatory Affairs