

February 18, 2011

U.S. Department of Transportation
Docket Operations
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue, S.E., Washington, DC 20590

**RE: NATA Support for Petition for Rulemaking dated January 31, 2011 –
Proposed Amendment To 14 CFR Part 61**

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.

NATA wishes to express its enthusiastic support for the petition for rulemaking dated January 31, 2011, Proposed Amendment to 14 CFR Part 61 (hereafter "the petition") and submitted by the Aircraft Owners and Pilots Association (AOPA), Experimental Aircraft Association (EAA), General Aviation Manufacturers Association (GAMA) and the National Association of Flight Instructors (NAFI). NATA's support is based upon the association's opinion that changes to 14 CFR Part 61 contained within the petition will have a positive effect on aviation safety and the growth of the pilot population.

Purpose and Summary of the Petition

The purpose of the position is to remove the regulatory roadblock that prevents pilots from crediting any of the training they received while pursuing a sport pilot certificate towards additional ratings and certificates. The remedy proposed by the petition accomplishes this purpose by recognizing the three distinct and separate training requirements for a recreational and private pilot certificate:

- Aeronautical Knowledge
- Flight Proficiency
- Aeronautical Experience

By recommending small changes to language of the aeronautical experience requirements for both the recreational and private pilot certificate, the petition allows for the crediting of overall experience, specifically that experience gained while pursuing a sport pilot certificate, while leaving intact the rigorous requirements for instruction, both in content and provision, in aeronautical knowledge and flight proficiency.

Justification for Support

NATA believes that the current FAA policy¹ of not allowing the crediting of experience gained while pursuing a sport pilot certificate towards additional certificates and ratings creates a disincentive for currently certificated sport pilots to receive training for additional ratings and certificates. This disincentive is created by treating, from a certification standpoint, a pilot who has amassed aeronautical experience while pursuing a sport pilot certificate identically to an individual who has no aeronautical experience whatsoever. Despite the fact “that many of the areas of operation on which an applicant for a sport pilot certificate is required to receive training are identical to those on which an applicant for a private pilot certificate is also required to receive training,”² that training is viewed as not relevant by current policy. NATA believes that regulatory disincentives towards receiving additional voluntary training should be removed as long as they do not unintentionally lower the overall level of aviation safety or have other adverse consequences.

The proposals outlined in the petition are very narrow and are well designed to remove the disincentive to receiving additional voluntary training without adversely affecting safety or creating unintentional consequences. The petition achieves this by focusing solely on overall aeronautical experience requirements for the recreational and private pilot certificate and leaving all other areas untouched. Flight proficiency training, aeronautical knowledge training, recency requirements and FAA final judgment in certification remain fully intact. NATA foresees no degradation in safety levels for certificated recreational and private pilots or unintended consequence resulting from the enactment of the regulatory changes contained within the petition.

¹ As outlined in a Letter of Interpretation (LOI) from FAA Office of Chief Counsel to Mr. Kern, dated July 24, 2009

² Kern LOI, July 24, 2009

Aside from not degrading aviation safety, the proposed regulatory changes contained within the petition will actually serve to increase safety. By recognizing that “experience begins to accrue the very first day that a student pilot sits behind the controls of an aircraft” these regulatory changes will encourage additional voluntary training and certification. FAA has long recognized that training and varied experience increase the level of safety.

Closing

NATA, again, expresses our support of the petition and asks, based upon the justification above, that the FAA undertake the rulemaking suggested by the petition at the earliest possible date.

A handwritten signature in black ink, appearing to read "Michael France". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael France
Director, Regulatory Affairs