

October 4, 2013

Margaret Gilligan
Associate Administrator for Aviation Safety
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Subject: Flight Training Providers and Qualification of Training Center Evaluators, Simulators and Instructors

Dear Ms. Gilligan:

The Federal government shutdown is directly impacting flight training providers and their customer operators because of the expiration of Training Center Evaluator (TCE) qualifications. This is one of many severe impacts on the aviation industry caused by the shutdown.

Already, among our respective organizations, dozens of evaluators' qualifications have expired. At the end of the October, several hundred additional TCE's qualifications will expire making it impossible for our organizations to schedule or conduct critical training activities. The lack of resources, coupled with the inability of the FAA to assist, will not only impact our workforce, but the entire U.S. aviation system. Additionally, both initial and recurrent qualifications for full flight simulators have been cancelled and will be cancelled as the shutdown continues. The lack of simulation resources will further impact the flight training industry's ability to train pilots. The flight training providers stand ready to assist the FAA in developing a process to re-establish the current approval as soon as the shutdown is over, but it is critical that these providers are able to continue to operate.

During this unprecedented shutdown, we request that the FAA allow qualified examiners, instructors and simulators that were current and qualified on September 30, 2013 (the day before the shutdown) to retain their qualification status beyond the existing FAA approval expiration for at least a 60-day period following the end of the shutdown period. Allowing FAA approved and qualified assets to continue to provide the same services that they have been providing for many years will ensure that aviation in the U.S. can continue to operate and will maintain the great safety record we currently enjoy.

This request is in the public interest as there are already several operators whose aircraft and pilots have been grounded due to the unavailability of qualified check airmen. While they would normally request a national resource to conduct the check, there are none available.

The request will also provide an equivalent level of safety as the continued qualification for examiners, instructors and simulators is based on rigorous quality systems (including SQMS) designed to ensure the examiners, instructors and simulators meet all regulatory and quality requirements throughout their qualification period and are ready for FAA inspection and certification at all times.

Sincerely,

Airlines for America
CAE
Era Training Center
FlightSafety International

General Aviation Manufacturers Association
National Air Transportation Association
National Business Aviation Association
SIMCOM