

November 13, 2018

**Electronic Submission**

Federal Aviation Administration  
Kristin Renault  
600 Maryland Ave SW  
Washington, DC 20024

**RE: Draft Advisory Circular 142-SCC, Standardized Training Curricula Delivered by Part 142 Training Centers**

The National Business Aviation Association (NBAA) represents the interests of over 11,000 companies who use aviation to support their business. This includes companies who manufacture aircraft, operate aircraft, repair and service aircraft, and conduct training. Many of these members operate under Part 135 and conduct training at Part 142 training centers.

In short, NBAA strongly supports the FAA's effort to allow Part 135 operators to use a standardized training program at a Part 142 training center.

NBAA appreciates the FAA's on-going efforts to review regulations and related guidance to ensure the U.S. airspace system is both safe and efficient. As noted in this draft Advisory Circular, a move to standardize training curricula across aircraft types for operations conducted under part 135 would

- enhance training and checking,
- leverage data and expertise,
- streamline training program approvals, and
- reduce administrative burdens.

NBAA members and staff were an integral part of the joint FAA Air Carrier Training Aviation Rulemaking Committee that submitted the recommendations and the Air Carrier / Contract Training Work Group that developed the recommendations leading to this draft Advisory Circular. Those recommendations were formed to provide relief to industry, both operators and training centers, who is frustrated with the current timeline and process for getting training programs approved.

NBAA understands that not all operators will be suited to use this new training program due to unique missions or aircraft configurations and appreciates that other options are available. NBAA believes the language in the introduction should clarify this is one option, but not the only option, for complying with the regulations, as this will provide clarity for those who do not wish to or are unable to use the standardized curriculum.

NBAA views this draft Advisor Circular as a logical extension of the work the FAA has been doing to further streamline processes and increase standardization while maintaining the highest levels of safety. By standardizing curricula across aircraft types, small Part 135 operators will be able to improve training programs through the use of data that would otherwise be unattainable.

Thank you for the opportunity to submit these comments on behalf of NBAA's members. Please contact me if NBAA can provide any additional information.

Sincerely,



Brian Koester  
National Business Aviation Association