

May 11, 2026

Federal Aviation Administration
U.S. Department of Transportation
800 Independence Avenue, SW
Washington, DC 20591

VIA ELECTRONIC SUBMISSION

RE: NBAA Response to the National Flight Training Alliance (NFTA) Report: A Comprehensive Modernization of Pilot Training Conducted by 14 CFR Part 141 Training Organizations

The National Business Aviation Association (NBAA), representing more than 10,000 member companies and professionals, appreciates the opportunity to provide feedback on the NFTA's comprehensive blueprint for the modernization of Part 141 training organizations.

NBAA stands in strong support of the report's central premise: shifting from an hours-based, compliance-centric regulatory model toward a performance-based, data-driven system. For the business aviation community, this modernization is critical to ensuring that the next generation of pilots is prepared for the high-consequence, technologically advanced environment of Part 91, 91K and 135 operations.

Below, we identify the key elements of the proposal that NBAA supports, alongside areas requiring continued focus to ensure the needs of the business aviation community are fully met.

Elements of Support

1. Integration of Safety and Quality Management Systems (SMS/QMS)

NBAA endorses the proposed "Two-Tier" system. By mandating a formal QMS for Tier 2 status, the FAA will finally align flight schools with the safety cultures of professional flight departments. This ensures that a pilot's first introduction to aviation includes the risk management and standardization principles required in business aviation.

2. The Professional Pilot Track (Appendix P)

We support the creation of a 200-hour integrated curriculum. In particular, NBAA applauds the inclusion of Industry Advisory Boards (IAB). This mechanism allows our member flight departments to provide

direct feedback to schools, ensuring that "Day One" readiness includes competencies in single-pilot CRM, advanced automation management, and international operations.

3. Expansion of Technology and Simulator Credits

The recognition of Enhanced Advanced Aviation Training Devices (EAATD) and Extended Reality (XR) is long overdue. Business aviation has led the way in simulation; bringing these tools into primary training allows students to master complex glass-cockpit logic and emergency procedures in a safe, repeatable environment that better mirrors a modern business aircraft.

4. The Central Management Office (CMO) and Regulatory Efficiency

The "FSDO Lottery" remains a significant hurdle for our members who operate across multiple regions. NBAA supports the establishment of a national CMO to provide standardized interpretations and the "Pilot Training Management Manual" (PTMM) to reduce the administrative burden of fleet and facility changes.

Areas for Continued Focus and Clarification

While the NFTA proposal lays the framework for significant improvement, NBAA identifies the following areas where further refinement is necessary:

1. Scalability for Specialized Small-Scale 141 Schools

Many boutique Part 141 schools provide specialized transition training for the business aviation community (e.g., Upset Prevention and Recovery Training or specific turbine transitions). The FAA must ensure that the Tier 2 QMS requirements are scalable. We must not allow the administrative cost of a QMS to inadvertently shutter specialized schools that provide critical, high-level safety training to our members.

2. Alignment with the ACT ARC "Jet Transition" Standards

The NFTA proposal is broad, whereas the earlier ACT ARC 24-1 recommendations were highly specific regarding "Jet Transition" courses. NBAA encourages the FAA to ensure that the NFTA's "Professional Pilot Track" aligns with ACT ARC's rigorous standards for high-altitude, high-speed flight training to ensure seamless transitions into turbine aircraft.

3. Instructor Professionalism and Mentorship

The proposal introduces "Initial Teaching Experience" (ITE) for new CFIs. NBAA believes this must be more than a logbook entry. We advocate for a focus on mentorship models where senior instructors with Part 135 or 91 experience provide real-world context to the ITE phase, better preparing CFIs to eventually mentor the students they are training for corporate careers.

4. Leveraging Existing FAA Tools for Greater Efficiency

NBAA has seen significant efficiencies from more considered uses of existing FAA oversight tools. In one example, FAA's Letter of Authorization (LOA) process has been streamlined to provide more predictable authorizations for new and some used aircraft. We see benefit in this type of consideration for some provisions of this proposal, such as a process for adding additional aircraft to a pilot school's operational fleet. Streamlining this process would create additional incentives for schools to onboard new aircraft.

Conclusion

The NFTA Modernization Report provides a useful roadmap for a more agile and professional training industry. NBAA looks forward to working with the FAA and our industry partners as the Agency determines how best to evaluate this proposal, while strengthening the pilot pipeline and enhancing the safety of our National Airspace System.

Sincerely,



Douglas Carr
Senior Vice President
Safety, Security, Sustainability & International Affairs