

September 12, 2022

Federal Aviation Administration  
800 Independence Ave SW  
Washington, DC 20591

**RE: NBAA Comments to Docket No.: FAA–2022–0912 Notice of Proposed Rulemaking,  
Updating Manual Requirements to Accommodate Technology**

The National Business Aviation Association (NBAA) represents the interests of over 10,000 member companies. Members include organizations that design, manufacture, operate, and service many aircraft types. Members operate aircraft under title 14, Code of Federal Regulations (14 CFR), parts 91 subpart K (part 91K), 125, and 135. Additionally, members design aircraft of all kinds, including fixed wing, rotor wing, and advanced air mobility vehicles. With these members in mind, NBAA submits the following comments supporting the FAA’s proposal to update manual requirements to accommodate technology.

Specifically, the FAA proposes several amendments in 14 CFR, parts 91K, 121, 125, and 135 that would remove certain prescriptive manual requirements for certificate holders by:

- Updating manual requirements to reflect industry use of electronic and paper manuals,
- Requiring manuals accessed in paper format to display the date of last revision on each page, and manuals accessed in electronic format to display the date of last revision in a manner in which a person can immediately ascertain it,
- Revising the requirement for program managers or certificate holders to carry appropriate parts of the manual aboard airplanes during operations, and instead requiring program managers or certificate holders ensure the appropriate parts of the manual are accessible to personnel when performing their assigned duties, and
- Removing outdated language that refers to accessing information in manuals kept in microfiche and instead requiring that all manual information and instructions be displayed clearly and retrievable in English.

In the NPRM, the FAA clearly articulates that the requirements to carry a manual on each aircraft while away from the principal base of operations does not reflect current technology and the ability to access information electronically. NBAA believes the proposed amendments are logical and forward-thinking. The proposed amendment recognizes how technology makes information available to flight, ground, and maintenance crews. By requiring information in manuals to be accessible to crew when performing their assigned duties, rather than carried on board, the regulation recognizes the current use of technologies and any potential future operation of remotely piloted aircraft.

NBAA supports the regulatory revisions proposed in Docket No. FAA–2022–0912 that maintain safety and enhance efficiency. We look forward to continuing to work with the FAA towards improved safety and optimization of aircraft operations.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Koester", with a long horizontal flourish extending to the right.

Brian Koester, CAM  
Director, Flight Operations & Regulations  
National Business Aviation Association