

April 14, 2023

Mr. Robert Ruiz  
Flight Standards Policy  
Federal Aviation Administration  
800 Independence Avenue SW, Room 300 East  
Washington, DC 20591

**RE: AC 91-67A, Minimum Equipment Requirements for General Aviation Operations  
Under 14 CFR Part 91, § 91.213**

Dear Mr. Ruiz,

The National Business Aviation Association (NBAA) represents the interest of over 10,000 members who own, operate, manufacture, and maintain aircraft. NBAA holds safety as a core value and works closely with the FAA to ensure regulations and policies align with industry operating practices and capabilities. On behalf of NBAA and the business aviation community impacted by the FAA's announcement of AC 91-67A, Minimum Equipment Requirements for General Aviation Operations under 14 CFR Part 91, § 91.213, we request a 14-day extension to the current comment deadline of May 4, 2023.

NBAA welcomes new proposed policy regarding the use of minimum equipment lists (MELs) by general aviation operators. NBAA members have been eagerly anticipating this guidance since the FAA rescinded AC 91-67 in 2017.

We are reviewing the proposed guidance to ensure it reflects the needs of business flight departments operating within the United States and around the world, while maintaining safety. Due to the importance of this guidance and its impact on global operations, a detailed review is required. In order to thoroughly review the document and provide helpful feedback to the FAA, additional time is required.

For the reasons presented above, NBAA respectfully urges the FAA to extend the public comment period for draft AC 91-67A by 14 days.

Sincerely,



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