

December 22<sup>nd</sup>, 2021

Robert C. Carty  
Acting Executive Director  
Flight Standards Service  
Federal Aviation Administration  
800 Independence Ave SW  
Washington, DC 20591

RE: Proposed Standardized Curricula for Part 135 Delivered by Part 142 Training Centers,  
Instructor/Check Pilot Qualification Curriculum

Dear Robert,

The National Business Aviation Association (NBAA) represents the interests of over 10,000 members who own, operate, and train others to fly business aircraft, including flights under Title 14 of the Code of Federal Regulations (14 CFR) part 135. The NBAA has a long history of supporting safety, including through participation on the Air Carrier Training Aviation Rulemaking Committee and the Training Standardization Working Group. It is through this lens that NBAA offers its support for the proposed qualification curriculum for instructors and check pilots delivering the standardized curriculum to part 135 operators at part 142 training centers.

The proposed Instructor/Check Pilot Standardized Curriculum meets the requirements in part 135 for qualifying instructors and check pilots approved for use at a part 142 training center. The proposed curriculum tracks with the regulatory requirements for qualification as a 14 CFR part 135 instructor or check pilot, and includes the curriculum and subjects necessary to complete:

- Initial qualification
- Recurrent training every 12 calendar months
- Requalification
- Bridging, which provides a path for those who are currently qualified as instructor/evaluators for parts 135 or 142 the training required to include the Standardized Training Curriculum
- Variables such as transitioning to a new flight simulator/training device, operating system, and subsequent aircraft types

NBAA believes the proposed recommendation ensures instructors and check pilots will be prepared to deliver the standardized curriculum, ensures the training centers will calibrate instructor scoring across the instructors, and provides the flexibility for each training center to meet their client needs.

For these reasons, NBAA supports the proposed qualification curriculum for instructors and check pilots delivering standardized curricula for part 135 operators at 142 training centers. NBAA appreciates the FAA's consideration of these comments. We look forward to continuing to work with the FAA and industry towards our shared goal of enhancing safety.

Sincerely,



Brian Koester, CAM

Director, Flight Operations & Regulations