



August 6, 2020

The Honorable Steve Dickson
Administrator
Federal Aviation Administration
800 Independence Ave, SW
Washington, DC 20591

Dear Administrator Dickson:

On behalf of the Aircraft Owners and Pilots Association (AOPA) and National Business Aviation Association (NBAA), we appreciate the dedication of the Federal Aviation Administration (FAA) to continue providing safety improvements that benefit all airspace users and air travelers. Safety is the highest priority for general aviation, and we support the high-level goal of the Pilot Records Database (PRD) rulemaking to help better inform air carrier pilot hiring decisions.

However, we have serious concerns with the PRD Notice of Proposed Rulemaking (NPRM) and believe, as currently drafted, it would place burdensome and costly requirements on general aviation with little to no safety benefit. Our industry continuously demonstrates its commitment to proactive and performance-based safety innovations, but in our opinion, the proposed PRD requirements for general aviation will not improve safety.

Our focus on safety led general aviation stakeholders to actively participate in the Aviation Rulemaking Committee (ARC) that produced significant recommendations to inform the FAA's rulemaking process. Unfortunately, the NPRM was not reflective of the ARC recommendations and instead contains burdensome reporting requirements for certain Part 91 general aviation operators that we believe will not improve safety. The high cost of compliance with these new requirements will turn operators away from general aviation at a time our industry is already facing significant economic and operational challenges due to the COVID-19 pandemic.

During the ARC process, our community provided substantive feedback regarding the unique challenges the general aviation industry could face if required to participate in the PRD. We believe further consideration of those comments will help achieve the desired outcome of improved air carrier safety without the imposition of burdensome and costly reporting requirements for general aviation.

For example, the NPRM introduces a new definition of a "corporate flight department" as a person that operates two or more aircraft requiring a type rating in furtherance of a business. These entities would be required to submit records to the PRD; however, the new definition does not consider the significant compliance challenges for these operators, many of which are small businesses. We believe there are opportunities within existing FAA regulations to define better which operators should be subject to the PRD, without creating a new definition that will be difficult to apply to the general aviation community.

Further, the requirement for operators to report a pilot's aeronautical experience, flight time, and flight maneuvers performed to maintain privileges of their certificate is an example of a unique challenge for general aviation under the NPRM. Compliance with this requirement would likely require Part 91 operators to log every flight hour, instrument approach, and landing in the PRD after every flight. Once a pilot has obtained a certificate, details on currency are contained in the pilot's logbook, and requiring small businesses to conduct hours of data entry to duplicate this information will provide no safety benefit and will increase the risk of pilot record errors.

To comply with this proposed reporting requirement, small general aviation operators would need to invest in new systems, potentially hire additional staff, and reduce their focus on flight operations to accomplish hours of data entry and tracking. All of this would impose significant additional costs for many small general aviation businesses without providing useful insights for air carrier hiring decisions, as carriers already review a pilot's logbook to verify currency prior to employment.

Understanding that the PRD's primary goal is to inform air carrier hiring decisions, NBAA surveyed a subset of members to determine how many Pilot Record Improvement Act (PRIA) requests they currently receive from air carriers. We found that operators meeting the proposed "corporate flight department" definition receive less than one PRIA request every two and a half years.

Due to the extremely low volume of requests, it is not cost-effective for these operators to submit data to the PRD, as the existing process meets current needs. Past PRIA data also indicates that most air carriers found the majority of requests to Part 91 operators produced documents of no significance to the hiring process. Since essential FAA records, including pilot certificate and enforcement actions, will already be contained in the PRD for all pilots, requiring Part 91 operators to participate will not produce meaningful information to inform the air carrier hiring process.

In reviewing the legislative intent behind the PRD and the feedback provided by the general aviation community, we believe our recommendations can improve the NPRM without compromising safety. Hundreds of our members produced detailed comments to the docket expressing their concerns, underscoring what is at stake for general aviation.

With the relatively brief comment period for such a substantial rulemaking, we look forward to staying in communication with you and your team as we receive additional information on potential impacts to our members. Thank you again for your continued work with the general aviation community and the FAA's commitment to aviation safety.

Sincerely,



Mark Baker
President & CEO
AOPA



Ed Bolen
President & CEO
NBAA