

State Aviation Business Association:

December 4, 2020

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

Dear Administrator Dickson:

I write to you regarding a new rule recently issued by the Federal Aviation Administration (FAA) regarding a new Pilot Records Database (PRD). This new rule would place an enormous administrative burden on businesses and organizations around the country that depend on general aviation and local airports.

As you likely know, the PRD was established in 2011, following the formation of an aviation rulemaking committee that worked with a diverse set of industry stakeholders to provide recommendations on how to provide airlines with information to make safe, hiring decisions. Now, the FAA has published a Notice of Proposed Rulemaking that would add new, excessive and repetitive reporting requirements for flights by general aviation and business aviation operators. In addition, through the proposal of an unclear and unhelpful definition of a "corporate flight department" as businesses with two or more aircraft, the rule would also shift these reporting requirements from operators onto businesses.

While businesses are deeply committed to safety as the number one priority and ensuring that all necessary information is submitted in a timely and effective way, these changes would be repetitive, duplicative and place an enormous cost and administrative burden on businesses with no demonstrable safety benefit. By one estimate, this new rule could force small businesses to shoulder nearly \$10,000 annually in administrative costs. Besides being repetitive and duplicative, these changes would decimate our community at a time when businesses across America are already suffering and will likely continue to for years to come, resulting in a ripple effect on our nation's already fragile economy.

It has also not been made clear how these changes would enhance safety. Flight information that is required to be reported by this new rule is already available and used by those making hiring decisions. Furthermore, the new reporting requirements would take reporting away from operators who are doing the flying and put the onus on businesses.

Businesses of all sizes use general aviation to operate more efficiently, access small and rural communities where there may be limited transportation options otherwise, visit multiple worksites in the course of a day, and carry the tools and demonstration materials needed to stay competitive. There are over 5,000 airports across the country, and the vast majority of commercial travel flows through a couple dozen airports, leaving many airports, businesses, and communities to depend on general aviation. The general aviation industry supports an economic impact of \$247 billion per year, and more than 1.1 million

American jobs. General aviation also supports access to medical care, emergency services, powerline and pipeline maintenance, and natural disaster relief.

General aviation operations across the country are already down 30% from this time last year. Aircraft manufacturing companies, including Bombardier, Gulfstream, and GE Aviation have laid off, intend to lay off, or will furlough more than 10,000 employees collectively, and flight hours among general aviation operators are down. And, general aviation operators and businesses across our country are transporting critical supplies such as masks, tests, and PPE to communities in need.

As we emerge from this crisis, businesses need every resource at their disposal to get back on their feet. Mobility will be crucial to restoring the American economy, and burdensome requirements like this will only stifle our ability to grow.

Best regards,



Phil Roberts, President  
PAR Travel Tech, Inc.

CC:

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