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May 23, 2013

Ms. Nancy Kalinowski
Vice President, System Operations Services
Federal Aviation Administration
600 Independence Ave., SW
Room 3E1500
Washington, DC 20591

Re: Notice of Proposed Policy for Distribution of FAA Data and Information; Request for Comment

Dear Ms. Kalinowski,

The Aircraft Owners and Pilots Association (AOPA), representing nearly 385,000 pilots and general aviation enthusiasts nationwide, requests a 45 day extension to the current 30 day comment period offered on the Notice of Proposed Policy for Distribution of the Federal Aviation Administration (FAA) Data and Information. In addition, AOPA requests an opportunity for open discussion on the policy to offer clarity and the opportunity to answer questions the proposed policy does not answer.

While AOPA generally understands the need to provide for secure and operational effectiveness of FAA systems through a National Airspace System Enterprise Secure Gateway (NESG), the proposed policy does not indicate exactly what data is impacted and the standard by which the FAA will allow access to that gateway. The policy is vague about who will manage the gateway and what assurances exist to continue allowing access to all current data.

The Federal Register Announcement states the proposed data distribution policy "is in accordance with the presidential directive for Open Government issued on January 21, 2009." Memorandum M-10-06 from the Office of Management and Budget (OMB) directs executive agencies to "take specific actions to implement the principles of transparency, participation, and collaboration." Specifically, the OMB memorandum directs agencies to publish information online in an open format that can be retrieved, downloaded, indexed, and searched by commonly used web search applications. The FAA's proposed data distribution policy appears to contradict these principles by limiting access, distribution, and use of FAA data. AOPA would like to discuss how the FAA's proposed data distribution policy aligns with the intent of the Open Government Directive.

We appreciate your consideration of this request and look forward to learning more about the details of this proposed policy.

Sincerely,

Tom Kramer
Manager
Airspace and Modernization