



August 15, 2014

The Honorable Anthony Foxx
Secretary, Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590



Dear Secretary Foxx:

As representatives of general aviation pilots, manufacturers, and businesses, we are writing to request that the Department of Transportation and the Administration complete their reviews of the Federal Aviation Administration's (FAA) Notice of Proposed Rulemaking (NPRM) addressing third-class medical certification reform within the next 30 days and open the proposal for public comment.



The FAA's medical certification system has evolved into an onerous and costly one which has questionable, if any, benefit to general aviation pilots. Aeromedical safety has improved due to pilots properly assessing their physical fitness to fly, prior to each and every flight. The FAA recognized this standard 10 years ago in 2004 when it implemented the Sport Pilot rule. Over the last decade, this standard has been safely and effectively used by thousands of pilots.



The FAA, the world's premier aviation safety regulatory agency, has had significant time to evaluate the safety aspects of changes to the Third Class Medical, which has culminated in the development of this NPRM. In addition to the decade of experience with sport pilot, the general aviation community has waited two and half years for a response from the FAA regarding the AOPA/EAA Third Class Medical Petition. In lieu of granting this petition, the FAA has chosen to pursue meaningful changes through rulemaking.



Industry is developing a comprehensive online education course to ensure that pilots continue to have the information needed to self-assess their fitness to fly, as well as maintain the current and profound emphasis on safety. Coupled with an open and honest relationship with one's primary care doctor, this education course will enhance aviation safety.



Conservative estimates indicate that medical certification reform would result in an annual savings of more than \$1 million to the FAA. In addition, industry estimates that in 2012 alone, more than \$140 million was spent by applicants to obtain medical certificates. These resources could be reinvested in ways that do far more to enhance safety, including increased proficiency flying and installing advanced avionics and instrument technology equipment on aircraft.



As you know, all private pilots are required to undergo a flight review conducted by a certificated flight instructor at least every two years in order to act as pilot in command. During these flight reviews, instructors evaluate each pilot's cognitive condition, as well as his or her physical ability to safely operate an aircraft. If either is in question, they do not endorse the pilot.

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By implementing reforms that would lower costs and eliminate outdated and cumbersome processes for pilots, we can help ensure that the United States retains its global leadership in general aviation.

The general aviation community is enthusiastic to see this long overdue reform move ahead. We appreciate your immediate attention to this request.

Sincerely,



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Jack Pelton
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