



September 12, 2014

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

The Honorable Shaun Donovan
Director, Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Secretary Foxx and Director Donovan:

The Flying Physicians Association (FPA), the world's premier organization of physician-pilots, is requesting that the Department of Transportation and the Office of Management and Budget 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.

As you know, the FAA's NPRM would expand the number of pilots eligible to fly without the extra step of obtaining a third-class medical certificate in addition to their pilot's license – a standard that has been safely and effectively used by those exercising Sport Pilot privileges for more than a decade.

Many doctors who fly agree that the third-class medical is adding a burden with very little benefit.

The frequency of examination attests to the fact that pilots "self certify" their fitness to fly for as much as 60 months without any involvement with an aviation medical examiner (AME). From a medical perspective, very little significant pathology can be detected by an AME performing an FAA flight physical by the very nature of the examination requirements and procedures.

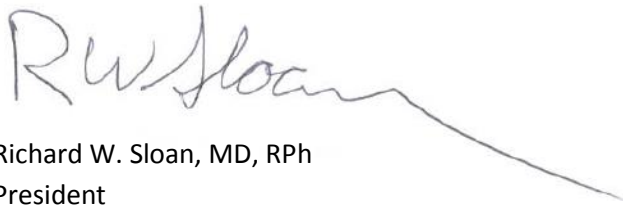
What is needed is a system that better assists pilots by continuing to educate them about maintaining their medical health and provides them with information needed to continually self assess prior to flight. Additionally, a system is needed that encourages, instead of discourages, open and honest dialogue between pilots and their long-time personal treating physicians. We believe this is a much better practice than a cursory medical exam with a doctor who has no history or clinical knowledge of an individual, as is often the case with FAA physicals.

FPA recently polled its members and found that the flying doctors support reforming the third-class medical system. Eighty percent of the flying doctors in the FPA survey, many of whom have backgrounds as Senior Aviation Medical Examiners and military Flight Surgeons, and all of whom are physicians with knowledge of the effects of flying (physical, mental and emotional), believe that the third class medical system as it exists is not necessary, does not add to safety, and can be eliminated for private flying.

FPA was founded in 1954, and has a long, proud history and a membership roster that reads like a Who's Who of medicine and aviation. Today the association's membership is comprised of physician pilots across the United States, as well as in Canada, England, Puerto Rico, Germany and the West Indies. FPA members are devoted to promoting aviation safety and education, cross-disciplinary medical education, charitable and public benefit activities that capitalize on their medical and aviation skills, and social activities involving like-minded physician-pilots.

The members of the Flying Physicians Association and the general aviation community are enthusiastic to see this long overdue reform move ahead and ask for the timely and expeditious review of the NPRM.

Sincerely,

A handwritten signature in cursive script that reads "Richard W. Sloan". The signature is written in dark ink and has a long, sweeping underline that extends to the right.

Richard W. Sloan, MD, RPh
President
Flying Physician Association
Senior Aviation Medical Examiner
(AME)
Colonel, PAANG, FS/MC, Ret.