



May 21, 2019

The Honorable Daniel K. Elwell
Acting Administrator
U.S. Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Re: Streamlined Launch and Reentry Licensing Requirements Rulemaking (FAA-2019-0229) - Comments and Request for 60-Day Extension of the Comment Period

Dear Acting Administrator Elwell:

As major aviation stakeholders, we strongly urge the FAA to develop a final rule that safely and efficiently integrates commercial space operations into the National Airspace System (NAS), while considering its significant effects on aviation. A robust regulatory framework that governs operations well into the future is critical as the commercial space industry is poised for tremendous growth. Given the magnitude and complexity of the proposed streamlining, we request that the FAA provide additional time for comments. This will enhance the quality of information gathered and comments provided by all aviation stakeholders.

Transparency, through collaboration and inclusive participation, is critical to safety. The FAA and the commercial space industry should leverage the wisdom and experience of the commercial airline industry that have helped achieve its remarkable safety record and information sharing, like shared safety information through the Aviation Safety Information Analysis and Sharing Program (ASIAS), rather than proprietary solutions, are the means for advancing commercial space safety.

Through its commercial space Aviation Rulemaking Committees, Advisory Committees, and rulemaking, the FAA should integrate the significant resources that aviation, commercial space, and government stakeholders have committed to the safe and efficient integration of commercial space operations into the NAS. The FAA should ensure that the rules are consistent with any forthcoming recommendations resulting from those initiatives, including access priorities and vehicle licensing requirements. Increasing safety levels necessary to allow commercial space operations to safely integrate with airline operations requires the FAA broaden its strategy beyond the current regulatory framework proposed in this rulemaking activity.

The FAA's mission is to provide the safest, most efficient aerospace system in the world. Preserving the safety and efficiency of the NAS is critical to the U.S. economy. Accordingly, the FAA must consider how commercial space operations that result from the proposed streamlining will affect the efficiency of the NAS. Specifically, the FAA's rulemaking must include a process for conducting a comprehensive assessment of the operational and financial effects of commercial space operations. We encourage the FAA and the commercial space industry to be transparent and to solicit information that will be relevant to the FAA and applicants' licensing and operations. This is essential for the successful integration of commercial space operations into the NAS.

The FAA also should implement NextGen capabilities and technologies that will improve efficiency for all NAS users including aviation and commercial space. The NAS requires specific Air Traffic Management tools to address the unique needs of commercial space and to effectively integrate these users into the NAS. To that end, a good first step would be for the commercial space should also begin participating in the FAA and industry's tactical collaborative process to manage the NAS (*e.g.*, participating in the Collaborative Decision Making (CDM) process). However, a broader modernization initiative that accommodates the needed improvements for commercial space integration also must be established.

The Streamlined Launch and Reentry Licensing Requirements rulemaking offers an opportunity to establish a new collaborative environment between commercial space and traditional aviation, producing the safest and most efficient NAS. We look forward to providing additional comments and information in the subject rulemaking and respectively request that the FAA extend the rulemaking comment period by 60 days.

Sincerely,



Joseph DePete
President
Air Line Pilots Association



Todd Hauptli
President & Chief Executive Officer
American Association of Airport Executives



Nicholas E. Calio
President and CEO
Airlines for America



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Kevin M. Burke
President and CEO
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Faye Malarkey Black
President
Regional Airline Association

cc: The Honorable Elaine Chao, Secretary, U.S. Department of Transportation
The Honorable Neomi Rao, Administrator, Office of Information and Regulatory Affairs