

May 29, 2020

Mr. Ali Bahrami
Associate Administrator for Aviation Safety
Federal Aviation Administration
800 Independence Ave., S.W.
Washington, DC 20591

Dear Mr. Bahrami:

We write today to respectfully request the FAA extend certain exemptions expiring June 30, 2020 in SFAR 118 (Relief for Certain Persons and Operations during the Coronavirus Disease 2019) to allow affected pilots, aircraft owners, and manufacturers to continue their important role to the U.S. and worldwide economy and overall public benefit. We request:

1. An additional 1 month of flexibility for pilots, operators, and certificate holders to comply with certain training, recent experience, testing, and checking requirements provided in SFAR 118;
2. Additional relief until September 30 for duration, medical and renewal requirements provided in SFAR 118, and;
3. Relief for pilots, operators, and certificate holders who face expiring experience, testing, checking, duration, medical, and renewal requirements in July, August, and September 2020

On April 30, 2020, SFAR 118 became effective, allowing thousands of private, commercial, and other pilots flying in general aviation and air carrier operations to continue operating. Pilots with medicals nearing expiration have been able to keep flying with low risk to safety, and have been able to retain flight currency to continue operations for the public benefit. These are just a few examples of the successful outcomes for the general and commercial aviation communities and the public because of SFAR 118. We sincerely appreciate the FAA's hard work in developing and publishing such a monumental SFAR in a very short period.

We are pleased and heartened to see that the hard work by federal, state, and local governments and diverse groups of essential workers have resulted in a slowing and reduction of COVID-19 cases. In many places in the U.S., individual states have begun lifting stay-at-home/shelter-in-place restrictions and businesses are beginning to reopen. However, while restrictions are easing in some areas, we continue to see burdens and restrictions that will continue to negatively impact the aviation community into the foreseeable future.

The Centers for Disease Control announced the U.S. reached 100,000 COVID-19 related deaths on May 28, 2020,¹ and continues to recommend limited contact with those outside of your household.² Even though some restrictions are beginning to ease or disappear, many states and local governments still enforce social distancing requirements.³ The public remains wary of venturing out,⁴ and many aviation

¹ <https://www.cdc.gov/media/releases/2020/s0528-coronavirus-death-toll.html>

² <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/social-distancing.html>

³ <https://www.uschamber.com/article/state-by-state-business-reopening-guidance>

⁴ https://www.washingtonpost.com/politics/americans-widely-oppose-reopening-most-businesses-despite-easing-of-restrictions-in-some-states-post-u-md-poll-finds/2020/05/04/495ddc3a-8e36-11ea-9e23-6914ee410a5f_story.html

stakeholders desire to minimize their risk to exposure. Additionally, we have heard from many individual members reporting CFIs and DPEs who are not comfortable working in close vicinity with students. As more than 57% of DPEs are over the age of 60,⁵ a demographic at higher risk for severe effects of the COVID-19 disease, their hesitation is understandable. Similarly, some AMEs remain unavailable or will take several weeks to schedule due to social distancing requirements. As you can see, general and commercial aviation continue to face significant challenges in meeting not only the requirements of the FARs but also the newly prescribed time periods under SFAR 118.

Although SFAR 118 is effective until March 31, 2021, most of its extensions will expire on June 30, 2020. In the Federal Register announcement of SFAR 118, the FAA recognized general aviation's significant contributions to the economy and the nation's efforts to recover from the COVID-19 pandemic as described in our April 1, 2020, letter.⁶ We urge the FAA to extend the relevant relief in SFAR 118 for those unable to comply with certain training, recent experience, testing, checking, duration, medical, and renewal requirements.

The undersigned associations request the FAA grant pilots, operators, and certificate holders 1 month of additional relief to that provided in SFAR 118 to comply with certain training, recent experience, testing and checking requirements. In addition, we request the FAA grant relief until September 30 for duration, medical, and renewal requirements provided in SFAR 118. The aviation community continues to move through an unprecedented and unpredictable period in our nation's history. The nation's return to unrestricted movement and person-to-person contact is taking longer than expected. While government entities continue to progress through various stages of reopening, additional flexibility will allow airmen and examiners to abide by CDC and individual state recommendations while stimulating the economy and moving medical and emergency supplies when needed. The safety mitigations currently in SFAR 118 will continue to ensure an equivalent level of safety during these additional extensions.

The undersigned associations also request that the FAA make similar relief available to those pilots, operators, and certificate holders who face expiring experience, testing, checking, duration, medical, and renewal requirements in July, August, and September 2020. As previously mentioned, the nation's recovery from the COVID-19 pandemic is slower than initially predicted. The mitigations included in SFAR 118 have proven effective, and they will allow these operators to continue conducting necessary relief flights safely while accommodating stay at home orders and social distancing requirements rescinding at various rates.

We appreciate your positive consideration and timely implementation of this request and look forward to working with you to assist in this effort.

Sincerely,

Aircraft Owners and Pilots Association
Air Medical Operators Association
Experimental Aircraft Association
Helicopter Association International

National Agricultural Aviation Association
National Air Transportation Association
National Business Aviation Association

⁵ From data compiled by AFS-930 Safety Analysis and Promotion

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