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September 24, 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:

We, as members of the Aircraft Owners and Pilots Association Medical Advisory Board, are writing to request the Department of Transportation and the Office of Management and Budget to expedite their respective reviews of the FAA's Notice of Proposed Rulemaking on third-class medical certification reform.

As physicians and pilots, we have a thorough understanding of both the physical and aviation aspects of the issues surrounding medical certification. Also, those of us who are FAA designated Aviation Medical Examiners (AMEs), have firsthand knowledge of how the FAA's medical certification system has evolved over time. While the intent was good, the process as it now exists can lead to onerous paperwork and costly medical testing processes that are out of line with current best medical practices and the exam itself is unlikely to provide little, if any, benefit to general aviation pilots.

During the interval of two to five years between third class medical exams, every pilot self certifies every time that he or she is safe to fly. Most private pilots receive third class certification based upon cursory medical examinations conducted by doctors who often have only the limited history and clinical information pilots provide using the FAA's MedXpress online applications system. Many AME's are not pilots themselves, and they are rarely the pilot's primary care physician. The complicated and confusing nature of the FAA's medical application, coupled with the potential for the costly and time consuming delays that can occur when the FAA requires additional information for conditions when reported, combine in many instances, to keep pilots from pursuing their freedom to fly.

What the aviation community really needs is a system that educates pilots about maintaining their medical health and provides them with information needed to continually self-assess their fitness prior to every flight. This system should encourage open and honest information exchange with the pilot's long-time treating personal physician—something the current system discourages.

The FAA recognized these issues more than 10 years ago with the implementation of the Sport Pilot Rule. Thousands of pilots safely flying without a third class medical since, clearly shows the FAA's decision was correct.

Expanding this successful standard will not only save the federal government and general aviation pilots millions of dollars each year, it will also improve safety, and foster a more open dialogue with pilots and

Secretary Foxx, Director Donovan September 24, 2014 Page 2

their personal physicians. A combination of education, self-assessment, and recurrent training has and will continue to ensure medical safety in the skies.

In our opinion, reforming the third-class medical certification process would save pilots and the FAA time, resources, and money that could be reinvested in ways that do much more to enhance safety, including increased proficiency flying and installing advanced safety equipment in aircraft.

We appreciate your time and consideration and again urge you to complete these departmental reviews within the next 30 days. Please do not hesitate to call on us if you would like to discuss further.

Sincerely

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