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James Viola  
Manager, General Aviation and  
Commercial Division, AFS-800  
Federal Aviation Administration  
Orville Wright Bldg (FOB10A)  
FAA National Headquarters  
800 Independence Ave. SW  
Washington, D.C. 20591

**RE: FAA Final Rule, Student Pilot Application Requirements  
Docket No. FAA-2010-1127 (Jan. 12, 2016)**

Dear Mr. Viola,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, respectfully requests the Federal Aviation Administration (FAA) correct an unfortunate consequence arising out of the FAA's final rule, "Student Pilot Application Requirements," issued January 12, 2016 (SPAR Rule).

A student pilot certificate is a critical component in one's training progression. With the proper endorsement, the certificate permits a student pilot to solo an aircraft during his or her flight training – a milestone event in the path to becoming a certificated aviator. Prior to issuance of the SPAR Rule, student pilots were capable of soloing in an airplane or rotorcraft on his or her 16th birthday (or 14th birthday in the case of gliders or balloons) by retrieving a student pilot certificate directly from an Aviation Medical Examiner (AME), FAA Flight Standards District Office (FSDO) or designated pilot examiner (DPE).

Soloing in an aircraft represents the first pinnacle achievement for any pilot. Allowing a student pilot to solo on his or her birthday is a time-honored tradition. It allows a teenager to combine the joy of turning 16 with their love for flying. Many students even take the opportunity to solo in multiple aircraft on their birthday, inspiring their friends and peers to start flying. In a community losing thousands of private pilots per year, enabling a student pilot to fly on his or her birthday is another tool for the FAA and industry to bring the next generation of aviators into the community.

The SPAR Rule fundamentally changes the process and manner in which a student pilot applies for and receives a student pilot certificate. Under the new procedures, effective April 1, aviation medical examiners (AMEs) will no longer process and issue a student pilot certificate. Instead, certified flight instructors (CFIs), among other authorized individuals, will process the applications, either through the FAA's paper form or online Integrated Airman Certification and/or Rating Application (IACRA). The FAA will then issue the student pilot certificate after

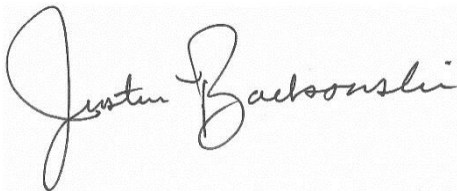
the applicant has been screened by the Transportation Security Administration (TSA), a process which, in total, is estimated to take up to three weeks.

One unfortunate consequence of the SPAR Rule is that student pilots will no longer be able to solo on their 16th birthday. Under the newly revised Advisory Circular (AC) 61-65F, the FAA states that the “authorized individual must ensure the applicant meets the eligibility requirements of § 61.83,” which sets the eligibility age, before processing an application for a student pilot certificate. The SPAR Rule notes approximately three weeks or less as the turnaround time between date of application and receipt of the certificate. Thus, given that an applicant cannot apply for a certificate until his or her birthday, the applicant will not be able to solo until at least a few weeks thereafter.

AOPA strongly believes that current regulations allow an applicant to *apply* for a certificate prior to his or her 16th birthday. The FAA could implement a procedure allowing a student pilot to apply no earlier than 30 days prior to his or her 16th birthday. The FAA could then issue a certificate with a limitation stating, “NOT VALID UNTIL (MONTH, DAY, AND YEAR OF 16TH BIRTHDAY),” which AMEs previously placed on student pilot certificates. This would comply with the current eligibility requirements in 14 CFR § 61.83.

In any case, AOPA urges the FAA to restore the ability for a student pilot to solo on his or her 16th birthday, whether through rulemaking, revision to current guidance, or otherwise. AOPA stands ready and committed to work with the FAA and appreciates the agency’s attention to this important issue affecting the next generation of the general aviation community.

Sincerely,

A handwritten signature in black ink that reads "Justin T. Barkowski". The signature is written in a cursive, flowing style.

Justin T. Barkowski  
Director, Regulatory Affairs