



421 Aviation Way
Frederick, Maryland 21701

T. 301-695-2000
F. 301-695-2375

www.aopa.org

October 1, 2008

Mr. James J. Ballough
Director, Flight Standards AFS-1
Federal Aviation Administration
800 Independence Ave., S.W.
Washington, DC 20591

Dear Mr. Ballough:

Re: Compliance Issues with Special Awareness Training for the Washington, D.C. Metropolitan Area; Final Rule

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of more than 415,000 pilots. Representing two thirds of the pilots in the United States, AOPA is the largest civil aviation organization in the world. Our mission is to effectively serve the interests of members as pilots or aircraft owners to establish, maintain, and articulate positions of leadership to promote the economy, safety, utility, and popularity of flight in general aviation aircraft.

The Federal Aviation Administration (FAA) is using the FAA Safety Team Web site (www.FAASafety.gov) for the delivery of the required "special awareness" training for pilots flying near the Washington, D.C. metropolitan area. This strategy creates challenges for pilots attempting to comply with new requirements. While we have discussed these concerns a number of times with you and your staff, they are still not resolved.

AOPA has requested that the FAA provide a direct link to the training course accompanied by a streamlined registration process. In addition, the FAA should enable pilots to print completion certifications at any point in time after the course has been completed. Because the training is required by February 9, 2009 we ask that the FAA implement the changes quickly.

Background on Special Awareness Training for the Washington, D.C. Metropolitan Area

The FAA is relying on training to address the operational concerns surrounding the Washington, D.C. metropolitan area and decrease the number of Air Defense Identification Zone (ADIZ) incursions. On August 12, 2008, the FAA published a final rule that required "special awareness" training for the Washington, D.C. metropolitan area. The FAA is requiring this training to, "educate the pilot community on how to avoid making inadvertent incursions into the Washington, D.C. ADIZ out of concern for the pilot community and a desire to alleviate the burden of FAA and other government resources."

Under the rule, any pilot who flies under visual flight rules (VFR) within a 60-nautical-mile radius of the Washington, D.C. VOR/DME (DCA VOR/DME) is required to complete

special awareness training by February 9, 2009. Special awareness training has been developed by the FAA and is available to pilots on the FAA Safety Team Web site.

A Direct Link to the Required Course is Needed

AOPA has a number of concerns surrounding the required registration process and location of the special awareness Web-based training. These issues present challenges to pilots who are actively seeking to comply with the new rule.

As we have discussed, the FAA Safety Team Web site requires users to complete a burdensome and complicated registration process before they can access the required special awareness training. Upon completion of the registration process, pilots need to navigate a series of vague menus in an attempt to find the section of the Web site where the training course is located. Upon finding the correct page, pilots are confronted with a list of 17 online training programs, none of which are entitled *Special Awareness Training for the Washington, D.C. Metropolitan Area*. The correct course, *Navigating the New DC ADIZ*, is the 11th course listed on the page. Difficulty in finding the course that pilots are now required to complete is compounded by the fact that the final rule does not list the course by name.

We request a direct link to the course, accompanied by a streamlined registration process. This will minimize the burden on pilots and encourage compliance with the final rule. Due to the relatively near-term compliance deadline, we request that the FAA make these changes as soon as possible. Once the proposed suggestions are implemented AOPA will actively educate the membership on the requirements of the new rule.

Availability of Course Completion Certificates

We appreciate the FAA's clarification that pilots who have completed the *Navigating the New DC ADIZ* course prior to the final rule are already in compliance with the new training requirement. However, pilots flying within 60 nm of the DCA VOR/DME are required to present the course completion certificate when asked to do so by a representative of the FAA, National Transportation Safety Board (NTSB), any Federal, State, or local law enforcement agency or an authorized representative of the Transportation Safety Administration (TSA).

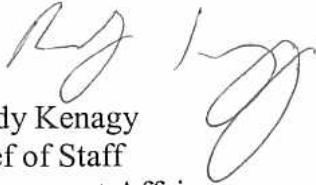
AOPA has learned that the FAA Safety Team Web site will only allow the generation of a course completion certification within one year of the actual completion of a course. Pilots who completed this required course more than a year ago are currently unable to generate the required certificate to show compliance with the rule even though the Web site indicates compliance.

This means that anyone needing a new copy of their course completion certificate more than one year after completion of the course will have to retake the course. The FAA should permit pilots to print completion certifications at any point in time after completing the course.

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With the compliance deadline only a few months away, these obstacles need to be quickly removed. The process for accessing the required training should be simplified, and the pilots who have already completed the required course should be recognized, and allowed to print completion certificates. Thank you for your assistance on this issue.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Randy Kenagy', is written over the typed name and title.

Randy Kenagy
Chief of Staff
Government Affairs