



421 Aviation Way
Frederick, Maryland 21701

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

www.aopa.org

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Mr. Joseph Tintera
Aviation Records Bldg. (ARB) 22
FAA Mike Monroney Aeronautical Center
6424 S. Denning Ave.
Oklahoma City, OK 73169

Mr. Tintera:

The Aircraft Owners and Pilots Association (AOPA), on behalf of its more than 415,000 pilot members nationwide is concerned about the Federal Aviation Administration's (FAA) new policy to terminate the knowledge testing administration privileges of CATS and LaserGrade testing facilities that have administered less than 25 tests in the previous year. This decision has resulted in the termination of testing privileges for approximately 120 testing centers across the country.

AOPA is asking that the FAA reverse this policy and immediately reinstate all testing centers.

Expedited Reinstatement of Testing Center Approvals

Many of these flight schools have appealed to the FAA for a dispensation and reinstatement of their testing privileges. In some cases the flight schools have asked for a dispensation because they are 100 miles or more from the nearest testing center. In other cases the testing centers have asked for a dispensation because they have administered 25 or more tests during multiple twelve-month periods in the last few years. To date, AOPA is aware of no cases in which the FAA has granted the reinstatement of these privileges.

AOPA is very concerned that this FAA policy punishes existing testing providers and does not support the ongoing industry effort to grow the pilot population. This policy will have a negative effect on the industry. AOPA is asking that the FAA immediately reverse this policy and reinstate all testing centers.

Negative Economic Impact on Flight Schools

Through conversations with your office, AOPA is aware that the FAA decision to revoke certain testing center privileges was an FAA "business decision." AOPA has not heard from the FAA how the negative financial impact of this decision on small businesses throughout the United States was evaluated and factored into this decision.

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The loss of testing privileges is having a short-term negative financial impact on these small businesses and will have a long-term negative effect on the ongoing industry initiative to increase the pilot population. Attached you will find actual examples from flight schools illustrating how the loss of testing privileges has, and will, negatively impact their flight training operations and business.

AOPA is also concerned that financial investments made by these testing centers in equipment, facilities, staff training, and testing materials were not factored into the "business decision" made by the FAA. Many flight schools impacted by this policy rely on their testing centers to provide the full range of training to students. Without knowledge testing capability, schools will lose students and business that could result in business closures and job losses.

Adverse Effect on Pilot Population

AOPA is concerned that the recent FAA action to close testing centers across the nation adds an additional barrier to entry for those considering learning to fly and acts against industry efforts to increase the pilot population at a time when unrestricted access is becoming critical for our industry to reverse a downward trend in the pilot population.

Currently, AOPA is leading an industry initiative to grow the pilot population. This initiative includes invitations to fly, flight scholarships, free subscriptions to *Flight Training* magazine, and the creation and launch of a new Web site, www.LetsGoFlying.com, designed to expose potential pilots to general aviation.

Sincerely,



Robert E. Hackman
Senior Director
Regulatory Affairs

cc: James Ballough, Director, FAA Flight Standards