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November 22, 2010

Docket Operations
M-30
U.S. Department of Transportation
1200 New Jersey Avenue, SE.
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: Docket No.: FAA-2010-1060 Policy Clarifying Definition of “Actively Engaged”
for Purposes of Inspector Authorization

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of more than 401,000 members. AOPA’s mission is to effectively serve the interests and needs of its members as aircraft owners and pilots and establish, maintain, and articulate positions of leadership to promote the economy, safety, utility, and popularity of flight in general aviation aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization in the world.

AOPA is requesting a 60 day extension to the current 30 day comment period of the actively engaged policy published in the Federal Register on November 5, 2010. This change in policy affects not only aircraft inspectors but the aircraft owners and airports which they serve. The original 30 day comment period does not allow the time necessary to fully investigate the proposal, notify and gather feedback from all those affected, and develop meaningful and substantive response to the docket. Many of the individuals affected by a change in the definition of “Actively Engaged” for the purposes of Inspector Authorization are just beginning to be aware of the proposed change and are contacting AOPA to voice their concerns. AOPA is requesting a 60 day extension so that we can provide comments after the holiday season. Without this extension, we will not be able to fully investigate the impact of this new policy and provide meaningful comments to the FAA.

Sincerely,

Kristine Hartzell
Manager, Regulatory Affairs
AOPA