



421 Aviation Way  
Frederick, Maryland 21701

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

[www.aopa.org](http://www.aopa.org)

April 4, 2011

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

Docket No. FAA-2010-0247  
Notice No. 11-01  
Safety Enhancements Part 139, Certification of Airports

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of over 400,000 members, more than two-thirds of the nation's pilots. AOPA is committed to ensuring the future viability and safety of general aviation airports and their facilities as a vital part of a state and national transportation system without the mandatory imposition of standards that will have a significant impact not only on airport sponsors but the aviation community who are the consumer of the services provided by airports.

We are writing to file our comments regarding modifications to training requirements for non-movement areas as contained in the above referenced Notice of Proposed rulemaking which was published in the Federal Register, Volume 76, Number 21 on Tuesday, February 1, 2011 as a Proposed Rule.

We believe the proposed rule attempts to implement a "one size fits all" to training requirements for access to non-movement areas of Part 139 certificated airports. Further, we believe the proposed rule fails to consider the unique characteristics and physical layout of individual airports. Because of these very significant differences, each airport will have differing needs. For example, non-movement areas for airports that serve airline operations are far different than airports that only serve general aviation (GA) aircraft. Additionally, at some of these airports, whether the operations are GA only or airline related, the general aviation hangar facilities are located some distance from the primary ramp areas or even on opposite sides of the airport.

It is our opinion that initial training should be adequate to familiarize an individual with a need to access non-movement areas on the airport. Recurrent training should only be required under several conditions. For example, 1) when there is a change in the physical airport infrastructure or 2) where there has been a history of violations. The proposed mandatory recurrent training is in our opinion, overly burdensome for a number of smaller airports whose personnel and budget

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resources are limited. Rather than requiring mandatory recurrent training, the airport sponsor should have the flexibility to implement training requirements as they believe necessary to maintain safety at the airport. The airport sponsor is best suited and equipped to determine the needs for the specific airport.

The NPRM notes that the FAA proposes to provide exemptions from training requirements under certain conditions including "Airman exercising the privileges of an applicable airman certificate." However, there are clearly times when someone holding an airman certificate may have reason to be operating in a non-movement area for purposes of assisting an existing airport tenant for an aviation related issue but who is not necessarily based at that specific airport.

Additionally, it is unclear as to how an airport sponsor would actually police or control entry to non-movement areas when the airport has not yet implemented access control systems. At some general aviation airports that fall under this proposed rule, there are times when a non-certificated, non-flying family member may be called upon to pick-up an aircraft operator who is based at the airport. While we can surely understand the FAA's and airport sponsor's desire to ensure that such activity is conducted in a safe manner without potential of injury or accident on the airport, we also believe that a basic introductory training program or a printed, graphical depiction of the airport layout and safe operating procedures on a one-time basis could be adequate.

We appreciate the opportunity to submit our comments on this proposed rule. We encourage the FAA to implement additional flexibility in the proposal and to eliminate the requirement for mandatory annual retraining unless circumstances at a specific airport necessitate additional training.

Respectfully submitted,



Bill Dunn

Vice President

Airport Advocacy