

May 7, 2012

Re: AOPA /EAA Medical Exemption request Aircraft Owners and Pilots Association and Experimental Aircraft Association - Exemption/Rulemaking (Document ID FAA-2012-0350-0001)

Dear Sir or Madam:

Today I write to you to strongly support the AOPA /EAA Medical Exemption request Aircraft Owners and Pilots Association and Experimental Aircraft Association (as described above).

I hold an FAA-issued private pilot license with 721 hours of total flight time. As the owner of an experimental aircraft I fly about 80 hours annually for recreational use.

To assess whether I am medically fit to fly between medical exams, I rely on guidance provided by FAR 61.53, which states:

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§ 61.53 Prohibition on operations during medical deficiency.

(a) Operations that require a medical certificate. Except as provided for in paragraph (b) of this section, a person who holds a current medical certificate issued under part 67 of this chapter shall not act as pilot in command, or in any other capacity as a required pilot flight crewmember, while that person:

(1) Knows or has reason to know of any medical condition that would make the person unable to meet the requirements for the medical certificate necessary for the pilot operation; or

(2) Is taking medication or receiving other treatment for a medical condition that results in the person being unable to meet the requirements for the medical certificate necessary for the pilot operation.

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To my knowledge the FAA provides no further information about self-assessment of a pilot's medical fitness to fly. My decision to fly prior

to each flight is made in part on whether my personal "medical minimums" have been met. For example, before flying I insist upon having a restful sleep the night before, be free of illness and emotional upset, etc.

Relying solely on my knowledge of a medical condition (or taking medication) that would disqualify me from passing a Third Class medical is a poor standard for me to judge my fitness to fly.

I strongly believe that a course developed to educate pilots in how to effectively assess their medical fitness to fly would improve flight safety to a degree that would significantly exceed the status quo.

The proposed exemption (as described in Document ID FAA-2012-0350-0001) would give pilots who fly recreationally the option of participating in a recurrent online education program that will teach them how to self-assess their medical fitness to fly. The public would see four major benefits if the FAA were to approve this proposed exemption:

**Benefit #1:** The number of pilots participating in General Aviation would increase.

Relentless increases in the cost of flying continue to reduce how many hours per year I can afford to fly. For example, in 2004 I was able to afford recreationally flying 150 hours in an aircraft that burned 13 gallons of avgas per hour. In 2012 I can only afford to fly 80 hours in an aircraft that burns 7 gallons per hour.

Rising costs keep me grounded on many flyable days, a phenomenon shared by thousands of General Aviation pilots across the United States. The FAA's approval of the proposed exemption would lower the cost to fly by eliminating the \$110 recurring cost of a Third Class medical exam, thereby increasing cash available to recreational pilots with which they use to fly.

With a lower cost of flying, the number of General Aviation pilots would increase, which in turn would allow for increased flight services and economic activity that benefits the general public.

**Benefit #2:** The proposed exemption would significantly reduce the regulatory burden currently imposed upon recreational pilots. Some recreational pilots currently holding Third Class medical certificates would be relieved of the task of filling out Third Class medical certificate applications if they chose to self-assess under the proposed exemption.

**Benefit #3:** The FAA, which would see a lower cost of administering the current system because fewer pilots would be applying for Third Class medical certificates. Lower costs to the FAA mean lower costs to the American taxpayer.

**Benefit #4:** Participating in continuing aviation education increases safety.

My continuing aeronautical education is of paramount importance to me, and I look to the FAA and organizations such as the AOPA, EAA, and AVweb to deliver up-to-date content in the form of courses, seminars, magazine articles, etc. to make me a safer pilot. In particular, I rely on the FAA's Wings program to provide valuable aviation-related content to keep me abreast of major issues. The proposed exemption would provide information I need to self-assess my medical fitness to fly, in stark contrast to the vague guidance provided in FAR 61.53.

If the proposed exemption is approved, I suggest that the FAA create a medical self-assessment component to the Wings program, and create medical self-assessment seminars in online and in-person formats.

For these reasons I urge the FAA to approve the AOPA /EAA Medical Exemption request Aircraft Owners and Pilots Association and Experimental Aircraft Association - Exemption/Rulemaking (Document ID FAA-2012-0350-0001).

Thank you.

Sincerely,

John Leggatt