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September 5, 2017

Mr. Glen Martin
Vice President, Air Traffic Services
FAA National Headquarters
800 Independence Ave SW
Washington, DC 20591

Re: Mobile Devices for IFR Clearance Delivery and IFR Release

Dear Mr. Martin,

I am writing on behalf of the Aircraft Owners and Pilots Association (AOPA), which represents two-thirds of all U.S. pilots, regarding our support for MITRE's prototype app that enables the electronic transmission of Air Traffic Control (ATC) pre-departure clearances to a pilot's mobile device. We believe the FAA should embrace this technology as it would make the thousands of general aviation IFR clearances given at towered and non-towered airports each day more efficient, reduce pilot and controller workload, and improve safety by reducing readback/hearback errors. In support of several industry committee recommendations on this topic, we request the FAA move quickly in fielding this app.

One of the recommendations in the *Performance Based Navigation (PBN) Route System Final Report*, an industry consensus report of the RTCA Tactical Operations Committee submitted to the FAA in August 2017, stated "the FAA should evaluate an affordable solution for general aviation to receive IFR clearances via their mobile device." This recommendation was written in acknowledgement that many general aviation aircraft cannot participate in the FAA's Data Communication effort due to cost of equipment. The report noted that "75% of pilots agreed they would find it operationally advantageous to receive their clearance for an IFR flight plan, on the ground at an uncontrolled airport, via communication with ATC using an app." AOPA strongly supports this recommendation given the number of general aviation pilots who would benefit from this app and who otherwise cannot participate in FAA's Data Communication effort.

In September 2016, the Flight Service NAS Efficient Streamlined Services (FSNESS) User Group submitted a list of recommendations to the director of Flight Service regarding improvements industry would like to see in a future Flight Service. Flight Service specialists frequently conduct clearance relay for pilots, a task which could be simplified using MITRE's app. The FSNESS User Group recommended the FAA investigate allowing pilots to use automation, such as apps, to reduce time-consuming and manual processes for the specialist and pilot.

We encourage the FAA to field test the MITRE app as soon as possible given the benefits it could provide to pilots and air traffic controllers. AOPA stands ready to support such a project. We appreciate the FAA recognizing the industry recommendations in support of this concept and the value pilots have noted. Thank you for reviewing our comment on this important issue.

Sincerely,

Melissa Rudinger
Vice President, Government Affairs
Airspace and Modernization