



50 F St. NW, Suite 750
Washington, D.C. 20001

T. 202-737-7950
F. 202-273-7951

www.aopa.org

April 10, 2018

Ms. Kristen Burnham
Vice President
Program Management Organization
Federal Aviation Administration
800 Independence Ave SW
Washington, DC 20591

Re: Importance of Future Flight Service Program to General Aviation

Dear Ms. Burnham,

I am writing on behalf of the Aircraft Owners and Pilots Association (AOPA), who represents two-thirds of all U.S. pilots, regarding the FAA's Future Flight Services Program (FFSP). AOPA is fully supportive of the FAA's Flight Service modernization efforts that will allow a more efficient delivery of products while improving their value. Our unique partnership has enabled AOPA to provide the user perspective and to collaborate with the FAA throughout the requirements process. We are pleased to see the results of this special relationship manifested in the Screening Information Request (SIR) as we believe it meets the needs of General Aviation pilots and benefits the agency. We want to take this opportunity to reiterate the importance of this SIR and Flight Service specialists to General Aviation.

First, AOPA does not support the discontinuance of the Flight Service specialist provided preflight or inflight service. We believe the Flight Service specialist will be necessary for the foreseeable future and as part of the FFSP. The Leidos data pointing to a decrease in telephone and inflight contacts fails to address why pilots still call and in such great numbers. We contend that solely listing the decline in utilization is misleading when Flight Service is still contacted via telephone over 3,000 times per day and contacted via radio hundreds of times per day. Many barriers prevent the realization of a fully automated preflight and inflight service, but we propose that working together we can promote the utilization of online self-assisted services and see the migration of many more General Aviation pilots to automated services. We support the SIR as it retains the human delivered services as part of the next contract.

AOPA has noted formally on several occasions that General Aviation pilots must have unencumbered access to speak to a Flight Service specialist and cannot be subject to any user fee. AOPA is opposed to any fee for services associated with aviation safety. Pilots are required by 14 C.F.R. §91.103, *Preflight action*, to become familiar with all information pertinent to that flight. This information may only be available to a General Aviation pilot via Flight Services. Charging a fee will cause pilots to utilize other services that may not meet regulatory requirements. We appreciate the FAA making modifications to the draft SIR to clarify that user fees are not being considered as part of this contract.

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In conclusion, we support the modernization effort of Flight Services and will continue to work closely with the FAA in identifying areas where improvements and efficiency can be achieved. Through the intensive work of AOPA and the FAA these past two years, the SIR reflects many of the requirements General Aviation has for the next Flight Service contact. We appreciate the opportunity to collaborate on a plan that will address the FAA's goal of becoming an "enabler" of flight services and that recognizes the ongoing needs of many pilots to speak to a Flight Service specialist. However, it is clear from our joint analysis of current barriers and user needs that this human provided service, utilized on average thousands of times per day, cannot be removed.

We encourage the FAA to publish the final SIR as soon as possible with the retention of the human provided services and the clarification that user fees are not being entertained. Thank you for reviewing our comments on this important issue. If you have any questions, please feel free to contact Rune Duke at 202-509-9515.

Sincerely,

A handwritten signature in black ink that reads "Melissa Rudinger". The signature is written in a cursive, flowing style.

Melissa Rudinger
Vice President, Government Affairs

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of General Aviation Pilots and Aircraft Owners. AOPA's mission is to effectively serve the interests of its members 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.