

April 1, 2020

Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20594

Dear Mr. Bahrami,

The general aviation industry appreciates the efforts taken by the Federal Aviation Administration (FAA) to issue policies and establish mechanisms for sustaining business activities and the ability of operators to continue to fly during the novel Coronavirus (COVID-19) pandemic. The FAA has taken important steps to address air carrier operations, training centers, and pilot schools as well as manufacturer and maintenance providers to help sustain those operations by issuing exemptions and deviations from regulations and policies.

The general aviation industry has requested similar exemptions and deviations to ensure the continuity of operations and commerce during the COVID-19 pandemic including but not limited to the following:

- Extension of 14 CFR Part 61 pilot currency requirements, e.g. flight review, IPC, PIC/SIC proficiency checks;
- Guidance that 709 reexaminations or paperwork inspections in person (such as logbook inspections under 61.51, or maintenance record inspections under 91.417) be held off or at least be conducted electronically during the current social distancing safety protocols and directives regarding non-essential activities;
- Extensions for certified flight instructor certificate renewal, expiration, and endorsement periods;
- Extension of knowledge exam expiration period;
- Extensions for applicants on the ability to complete practical examinations;
- Extension for filing documents under 14 CFR Part 13 (Subparts C, D, and G); and
- Extensions for aircraft maintenance and continuing airworthiness requirements with necessary mitigation procedures.

Similar civil aviation authorities, including the Brazilian ANAC<sup>1</sup>, EASA<sup>2</sup>, the Italian ENAC<sup>3</sup>, and the UK CAA<sup>4</sup>, have already provided similar exemptions to both commercial and noncommercial operations.

The agency stated that a challenge to expand these regulatory approaches to other segments of the aviation industry that conduct operations in general aviation is the requirement to justify the exemption or accommodation by showing a benefit to the public. Our industry can easily show its important role to the U.S. and worldwide economy and an overall public benefit. The following datapoints clearly demonstrate the public benefit of keeping general aviation flying during these difficult times:

- According to a PricewaterhouseCoopers LLP study, general aviation contributes 1.2 million jobs and \$247 billion in economic activity to the U.S. economy;

---

<sup>1</sup> ANAC issued a decision (Decisão No.42/2020) extending the validity by 120 days for all certificates expiring between March and June related to aircraft operation, including pilot licenses, medical certificates, and simulator qualification certificates.

<sup>2</sup> The Agency shared with Competent Authorities on 17.03.2020 an exemption template in accordance with Article 71(1) of Regulation (EU) 2018/1139 to support EU Member States in a collective adoption of exemption measures. The template proposes to extend the validity period of ratings, certificates and medical reports, as applicable, for flight crews, cabin crews, instructors and examiners, maintenance staff, air traffic controllers, and aeromedical examiners.

<sup>3</sup> The Italian ENAC exemption template for noncommercial operators can be found online at [https://www.enac.gov.it/sites/default/files/allegati/2020-Apr/NI\\_2020\\_010\\_ENGLISH\\_VERSION\\_0.pdf](https://www.enac.gov.it/sites/default/files/allegati/2020-Apr/NI_2020_010_ENGLISH_VERSION_0.pdf).

<sup>4</sup> The UK CAA exemption template for noncommercial operators can be found online at <http://publicapps.caa.co.uk/docs/33/ORS4No1354.pdf>.

- CISA<sup>5</sup> has designated transportation as a critical infrastructure sector, and the description includes recreational aircraft;
- Air medical is specifically named by CISA as a critical workforce, and air medical aircraft continue to provide lifesaving missions for those in need whether stricken by the COVID-19 virus or other health emergencies;
- General aviation moves essential personnel as well as cutting edge medical technologies directly to hospitals, doctors, and patients to fight the pandemic;
- Small aircraft monitor the health of critical utilities, including pipelines and powerlines;
- Aerial applications conducted in all 50 states treat approximately 127 million acres (28 percent) of cropland. Aerial application is also used for forestry treatments, fighting fires and making public health applications to eradicate mosquitoes and other disease-carrying pests—a vitally important benefit when a disease, insect or invasive plant must be treated immediately to save a crop ensuring the continued production of food and fiber during this time of crisis;
- General aviation directly connects more than 5,000 public airports, compared to the 500 used by scheduled airlines;
- Rotorcraft provide this nation a unique and highly adaptable tool. Vertical lift capability enables these aircraft to operate from nearly anywhere to support the movement of people, supplies and critical services. Additionally, they are invaluable assets to a wide range of public safety service providers (e.g. law enforcement, firefighting and search and rescue);
- General aviation aircraft continue to conduct humanitarian flights delivering masks, ventilators, and hygiene items to fill urgent needs.

We urge the FAA to take the important steps needed to enable the continued health of our multi-billion dollar industry, which provides an important service to so many components of the U.S. economy.

Sincerely,

Aircraft Owners and Pilots Association  
 Air Medical Operators Association  
 Experimental Aircraft Association  
 General Aviation Manufacturers Association

Helicopter Association International  
 National Agricultural Aviation Association  
 National Air Transportation Association  
 National Business Aviation Association

---

<sup>5</sup> Department of Homeland Security's Cyber Infrastructure and Security Agency's list of critical infrastructure sectors can be found online at <https://www.cisa.gov/identifying-critical-infrastructure-during-covid-19>.