



July 11, 2021

Honorable Stephen Dickson, Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Dear Administrator Dickson,

I write today to follow up on our recent discussion to urge the FAA to withdraw or invoke an immediate stay of the recent notification of policy for flight training in certain aircraft.

It is unfortunate that this notice was done without any public input from the general aviation community and, more importantly, does nothing to support the public interest as far as safety is concerned. It is simply a bureaucratic response that will overwhelm the FAA and create even more confusion than already exists around this issue.

As you know, the Administrative Procedure Act requires public notice and comment, not publication of the new rules and processes the FAA deems effective and enforceable. The FAA has issued numerous legal interpretations and statements in Notices of Public Rulemaking and Final Rules over the years on the topics of the characterization of compensated flight training and operation of an aircraft carrying persons for compensation or hire. Yet the FAA chose to ignore these in its recent notification.

The world's largest general aviation fly-in is two weeks away. More than 39,000 registered experimental, limited, and primary category aircraft are currently listed on the registry, and many of their pilots and owners fly to this airshow. Completing a new FAA invoked paperwork process to simply obtain "approval" to do what pilots have already been doing safely for years is simply mindboggling.

It is astonishing that the FAA is dramatically changing its legal interpretations of a longstanding regulation without changing one word of the regulation. Moreover, this recent notice simply imposes administrative paperwork requirements and burdens tens of thousands of aircraft owners, pilots, and flight instructors.

In short, this recent policy directive is unacceptable to the general aviation community and together we will pursue all options available to bring much needed clarity and common sense to this issue.

Again, we urge the FAA to immediately withdraw or stay this so-called flight training notice for certain aircraft.

Sincerely,

Mark Baker
President & CEO