



Center for Disease Control and Prevention
Mailstop F-80
4770 Buford Highway, NE
Atlanta, GA 30341-3717

VIA ELECTRONIC MAIL

Dear Sir or Madam:

As noted in CDC's order of January 26, 2021, the need for pre-flight COVID-19 testing protocols is becoming more critical as travel continues to increase worldwide. However, current international protocols are burdensome, time consuming, and have inherent limitations in processing large numbers of travelers. While the order allows for testing up to three days prior to travel, the nature of the missions operated by the business and general aviation communities is such that short-notice, on-site testing will be a significant aid in ensuring all passengers are appropriately tested for international flights.

The Aircraft Owners and Pilots Association (AOPA), the National Air Transportation Association (NATA) and the National Business Aviation Association (NBAA), in cooperation with commercial aeromedical support services, has identified an effective testing protocol that will meet the unique aspects of our international operations and stands ready to implement them when approved.

The testing protocol outlined in the attached information paper, supported by appropriate training and operator oversight, meets the requirements of the Order and we expect it to meet any compliance guidance that CDC or FAA may issue. We request CDC approval to begin such testing on international flights arriving in the United States to gain valuable operating experience in such testing.

Respectfully,

John McGraw
Vice President, Regulatory Affairs
National Air Transportation Association

Murray Huling
Vice President, Regulatory Affairs
Aircraft Owners and Pilot Association

Brian Koester, CAM
Director, Flight Operations and Regulations
National Business Aviation Association



RAPID, RELIABLE COVID-19 TESTING FOR BUSINESS AND GENERAL AVIATION

BACKGROUND

- CDC currently requires testing within three days of departure for passengers arriving in the United States from foreign locations, accompanied by an attestation that such testing has been completed.
- Tests compliant with the CDC order and yielding rapid, accurate results are available and well suited to ensure on-site pre-departure testing can be done for passengers who, for a variety of reasons, are unable to otherwise be tested within the three days in the Order.

PROPOSAL

- A complete FDA authorized test kit with instructions (written or video) is made available to international passengers and crew at the point of departure.
- Operators have procedures in place to ensure individuals with symptoms would not be eligible, would be appropriately handled with local medical personnel, and would not travel pending further medical actions.
- The airman or passenger receives the kit and self-administers the test under the supervision of a trained crewmember or lab technician via video, to ensure compliance with the CDC Order and ensure a positive match between the individual being tested and the results being reported.
- Test results are available in approximately 15 minutes, representing minimal operational impact while maintaining testing efficacy.
- Operators (properly trained) or lab technician monitor test results and ensure any individuals with inconclusive test results obtain PCR testing prior to travel.
- Operators ensure any individuals with positive results are notified and reported as appropriate for government procedures in force at the test location.
- With unambiguous negative results, the test subject takes a photograph including the test card with result, the subject him/herself, and a government issued ID.
- Operators have procedures in place to ensure passengers who have recovered from a previous COVID-19 infection have appropriate documentation per the CDC Order.
- Passengers complete the appropriate attestation per the CDC Order.

CONCLUSION

- A test protocol as described above, in conjunction with enhanced COVID-19 mitigations already in use, will allow efficient continuation of the vital international services provided by business and general aviation while continuing to mitigate the disease transmission risk.