

Christopher J. Cooper
Sr. Director, Regulatory Affairs
Aircraft Owners & Pilots Association (AOPA)
601 Pennsylvania Ave. NW
North Building, Suite 250
Washington, DC 20004

22 December 2022

Dear Christopher

Thank you for your letter dated December 14th 2022 and for the follow up conversation on the phone. It is very useful to hear your representation on behalf of the aviation industry and we appreciate your support on this matter.

PSI has led a number of changes over the years to ensure continuous improvement to the AKT program. With rapid advancements in technology and growing threats to security this is necessary to protect the integrity and assurance of the knowledge tests. While change is never easy, our decisions are always driven by a commitment to the FAA mission of safety in the skies.

As discussed, introducing the standardized Fee structure was not a decision PSI took lightly, and was done so only after extensive analysis to mitigate against any potential risks. Following our conversation, we believe a summary of this data would be useful to provide to you and we welcome you to share this with the wider industry as you see fit.

Given the fee difference is material to those affected, we are aware it may result in some providers revisiting the financial viability to continue offering testing services. However, as detailed below, this would not have a material impact on either access or availability of testing to any individual. Also, just to also restate – there will be no change to the applicant fees.

PSI is a global, high stakes testing provider with over 500 customers, many of whom require full national reach. As such, we have a very extensive professional test center network. Prior to the notification letter of November 18th, we carried out a detailed mapping of FAA current sites and availability of alternatives should the change result in any third parties leaving the network.

PSI has a large network of FAA authorized test centers that can easily cope with the volumes, and an even larger network that could be expanded should demand require.

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Current FAA Third parties seat capacity - TOTAL**	7,582
PSI alternative test centers with FAA authorization seat capacity -TOTAL**	40,421
Additional PSI test center* seat capacity -TOTAL**	90,293
Average # miles to alternative center	11.3 miles
# of alternative sites more than 30miles from FAA Third party	17

*subject FAA authorization

**TOTAL capacity within the next 28 days

Please note we are in active recruitment for the 17 locations with longer distances, and have already been successful in securing 2 of those into the network, including Alaska.

All test centers meet PSI's high standards for security, integrity and professionalism with PSI testing technology installed. We welcome as many or all the FAA current third parties to remain part of this important community. However, all test centers will need to adhere to the standardized fee structure outlined and in place for the remainder of our professional network. Given that we believe any risk of the fee change has been mitigated, we respectfully decline your request to delay and this structure will be effective January 1.

We do acknowledge your request for earlier communication on matters such as these going forward. With that in mind, we would welcome the opportunity to keep an open line of communication to you and the testing community. I would appreciate in the new year if we could speak again and discuss how best you could support facilitating that.

Lastly, as discussed on the phone, we are open to further discussion regarding the MTG program, but as that program is still going through implementation, we do not believe this to be the right time to have that conversation, so let's revisit that later in 2023.

Again, thank you for representing the perspective of the aviation industry, and we hope this supplemental information will offer reassurance to all our important stakeholders.

Sincerely



Janet Garcia

President, PSI Services

CC: Karen Lucke, FAA
Kieran O'Farrell, FAA

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