



## AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798  
Telephone (301) 695-2000 • Fax (301) 695-2375  
www.aopa.org

---

March 6, 2007

### BY ELECTRONIC MAIL

Docket Management Facility  
U.S. Department of Transportation  
400 Seventh Street, SW, Room PL-401  
Washington, D.C. 20590-0001  
Electronic Address: <http://dms.dot.gov>

### **RE: Docket No. FAA-2006-26714; Notice of Proposed Rulemaking; Drug Enforcement Assistance**

The Aircraft Owners and Pilots Association (AOPA), representing more than 410,000 members, submits the following comments on the Federal Aviation Administration's (FAA) proposal to change to its airmen certification and aircraft registration requirements. The FAA is proposing that two years after a final rule is issued, paper pilot certificates may no longer be used to exercise pilot privileges. To exercise pilot privileges, airmen would have to hold upgraded, counterfeit-resistant plastic certificates. In addition, under the FAA's proposal, those who transfer ownership of U.S.-registered aircraft would have five days from the transaction date to notify the FAA Aircraft Registry. The FAA cites that the purpose of the changes is to upgrade the quality of its data and documents to assist Federal, State, and local agencies to enforce the Nation's drug laws and improve security.

#### **Extend Aircraft Registry Notification Deadline**

AOPA recommends that the FAA extend the proposed deadline for returning an old certificate of aircraft registration from five to ten days. Given that there was no previous time limit associated with returning an old aircraft registration, and because the FAA could seek enforcement action against sellers who fail to return the old aircraft registration within the proposed five days, AOPA believes that it is in the public's best interest for the agency to give sellers a more reasonable timeframe for returning their old aircraft registration.

#### **More Secure Pilot License Enhances Security**

AOPA has advocated for making pilot certificates more secure. Ensuring that pilot credentials are not easily counterfeited contributes to a multi-layered system of security and AOPA is not opposed to a more durable certificate that can serve to further protect pilot identities. The new certificate along with the existing requirement that pilots carry government issued photo identification when exercising their pilot privileges is an

Docket Management Facility

Page 2

March 6, 2007

appropriate way to address DEA concerns without imposing an onerous regulatory burden on pilots.

In the interest of good public policy, and for reasons of fairness and avoidance of unintentional violations, AOPA asks that the FAA extend the deadline for returning the aircraft registration from five to ten days.

Sincerely,

A handwritten signature in black ink, appearing to read "Melissa K. Rudinger", with a long horizontal flourish extending to the right.

Melissa K. Rudinger  
Vice President  
Regulatory Affairs