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December 3, 2008

Mr. Tom Accardi  
Director of Tech Ops Aviation System Standards  
Aviation Records Bldg. (ARB) 22  
FAA Mike Monroney Aeronautical Center  
6424 S. Denning Ave  
Oklahoma City, OK 73169

RE: Chart Distribution Changes

Dear Mr. Accardi,

The Aircraft Owners and Pilots Association (AOPA), representing more than 414,000 members, is concerned with the proposed changes to the National Aeronautical Charting Organization (NACO) chart agent system. AOPA requests that the Federal Aviation Administration (FAA) address and mitigate these concerns prior to the planned public meetings in March 2009.

In June 2008, the FAA briefed AOPA on a plan to transition NACO to a High Performance Organization (HPO). At that time, AOPA raised questions regarding the FAA's implementation strategy and the potential impacts to users. The first public manifestation of the HPO is the planned reduction of NACO charting agents. AOPA's primary concern is a potential loss of access to safety materials, and potentially increased costs to end-users.

AOPA has been contacted by NACO chart agents indicating their intent to stop selling NACO charts to pilots. AOPA randomly surveyed thirty aviation businesses that currently offer NACO charts to pilots and found only six would be qualified to continue sales of the charts after the changes took effect. The FAA has suggested the use of a "Super-Agent" and "Sub-Agent" distribution system, but has not provided AOPA or the public with any details outlining how long this plan would take, or how effective it would be.

AOPA members have expressed concern that without direct FAA involvement in the distribution of charts, control of pricing would be compromised and availability would be limited. A distribution plan that guarantees NACO charts will be locally available to pilots in all areas and mandates chart pricing is needed. Pilots in outlying areas should not be required to purchase charts online as this would necessitate planning chart purchases weeks in advance, or be faced with expedited shipping costs. This represents degradation in service which would result in pilots not having the tools required for safety of flight.

Mr. Tom Accardi  
Page 2  
December 3, 2008

According to the NACO HPO documents, the financial savings the FAA would realize is insignificant compared to the loss of service that would result. In order to avoid a loss of access to charts and ensure that all issues are resolved, the FAA should address and mitigate these concerns prior to the planned public meetings in March 2009.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Kenagy". The signature is written in a cursive style with a large, stylized "K" and "G".

Randy Kenagy  
Chief of Staff  
Government Affairs