

October 26, 2016

Mr. Marcus Cunningham
Federal Aviation Administration Flight Standards Service
Aircraft Maintenance Division, AFS-300
800 Independence Ave. SW
Washington, DC 20591

VIA ELECTRONIC MAIL: marcus.cunningham@faa.gov

RE: PROPOSED AC 91-AIPRO, Part 91 APPROVED AIRCRAFT INSPECTION PROGRAM

The National Air Transportation Association (NATA) is the public policy group representing the interests of aviation businesses before Congress, federal agencies and state and local governments. NATA's nearly 2,300 member companies are a vital prerequisite for a vibrant general aviation sector providing fuel, aircraft maintenance, parts sales, storage, rental, flight training, Part 135 on-demand air charter, and fractional aircraft program management. Thus, our members are impacted by the FAA's development of the Approved Aircraft Inspection Program (AIP) Advisory Circular (AC) 91-AIPRO and appreciate the opportunity to submit comments.

NATA applauds the FAA's effort in creating the proposed AC. There is currently very little guidance to instruct industry on how to develop an AIP and this AC is a positive step forward. The average age of the general aviation fleet is increasing, making it important for owners to have the flexibility to develop an inspection program customized to the operation of their aircraft. The proposed AC provides the types of information necessary for aircraft owners and operators to safely operate and maintain their aircraft.

In addition, the proposal will also increase the consistent application of policy by clearly calling out the contents of an AIP. Currently, there is very little consistency between inspectors and offices regarding what information should be provided when applying for FAA approval of an AIP. This has resulted in a variety of approved programs and methods for achieving an equivalent level of safety. In some instances, programs have

not been approved because the inspector may not know what is expected. It is NATA's hope the proposed AC will provide inspectors the information and necessary comfort level to review and issue inspection program approvals.

Finally, as part of the continuing effort to ensure consistency and standardization, NATA requests that the contents of the AC and FAA inspector policy in FAA Order 8900.1 be aligned to the extent possible.

Thank you for the opportunity to share our views. We appreciate the agency's efforts on this important issue and look forward to our continued work together.

Sincerely,

A handwritten signature in blue ink, appearing to read "John McGraw", with a stylized flourish at the end.

John McGraw
Director, Regulatory Affairs
National Air Transportation Association