

October 2, 2015

Richard Mathews
Federal Aviation Administration
Flight Standards Service
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Delivered electronically Richard.Mathews@faa.gov

RE: Order FS 8000.AFSGDD, Flight Standards Service Guidance Document Development

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, airline servicing, flight training, Part 135 on-demand air charter, and fractional aircraft program management. As a result, our members are directly impacted by the ways in which the FAA's Flight Standards Service (AFS) personnel establish the policy and guidance to develop, update, or change AFS directives and advisory circulars (AC). We therefore appreciate the opportunity to submit comments.

NATA has been an active member on the Consistency of Regulatory Interpretation Aviation Rulemaking Committee (CRI ARC) and fully supports the FAA activities related to the implementation of the CRI ARC recommendations. We applaud the FAA in drafting this order to provide a more standardized framework for authors of guidance material. In an industry as highly regulated as aviation, the need for consistent, well thought out, and well-designed policy and guidance documents is crucial in order to maintain the highest standard of aviation safety.

As the FAA states in the draft document, the important role that guidance documents play cannot be emphasized enough. Given that, NATA feels strongly that the FAA consider training for its AFS employees who write or review policy and guidance documents. While some level of technical knowledge may be necessary, converting that knowledge into policy and guidance documents to support the regulatory framework is a talent that must be developed.

NATA appreciates the opportunity to submit comments on this important AFS order on guidance development and we applaud efforts by the FAA to implement the CRI ARC recommendations.

Sincerely,

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

John McGraw
Director, Regulatory Affairs