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*Delivered electronically via email to [Chandra.CTR.Walker@faa.gov](mailto:Chandra.CTR.Walker@faa.gov).*

**RE: DRAFT NOTICE 8900.CKP, REGULATORY REQUIREMENT TO PROVIDE ENOUGH FLIGHT INSTRUCTORS AND CHECK PILOTS/CHECK FLIGHT ENGINEERS**

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, on-demand air charter, aircraft rental, storage, flight training, aircraft maintenance, parts sales, line support and business aircraft and fractional ownership fleet management. Our members conducting part 135 operations are directly impacted by Federal Aviation Administration (FAA) regulations and guidance related to the provision of flight instructors and check pilots, and we therefore appreciate the opportunity to submit comments on this draft notice.

NATA welcomes the FAA's efforts to ensure inspectors and operators are aware of the need for operators to present, and inspectors to approve, qualified instructors and check pilots. While FAA resources are at times necessary, and are available for those training and checking events, in general this is a task appropriate to the use of delegated authority, freeing up resources for other agency priorities while safely accomplishing an important requirement.

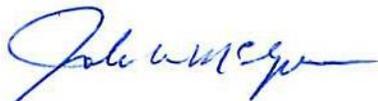
NATA also appreciates recent FAA efforts to revise the Flight Standards Inspector Resource Program (FSIRP) to improve resource allocation. We expect that limitations will continue on the availability of FAA resources to conduct routine training and checking events. It is our view that checking events performed by company authorized persons is the best option to safely alleviate stress on the FSIRP and that it is appropriate to encourage certificate holders to present qualified individuals to the FAA for training and checking authority. An emphasis on approving certificate holder instructors and check pilots will improve the timely availability of FAA resources in those instances where they remain needed.

The regulations are clear that operators should have authorized instructors and check pilots sufficient to support their operations. We note the mandate (14 CFR 135.323) to provide check pilots is absolute and is not related to the operators having reached a certain number or type of aircraft, pilots or checking events over a given period. Unfortunately, NATA members report these are the very reasons commonly given to operators when the agency denies individuals the ability to obtain check pilot authority. To enhance clarity on this matter in the guidance, NATA recommends inserting the language below as a note following paragraph 6.b. of the draft notice:

**“Note:** The certificate holder obligation to ensure enough flight instructors, check pilots/check FEs is not conditional on the certificate holder’s number of authorized aircraft or the number of pilots that will receive training or checking.”

NATA is grateful the FAA continues to provide clarity on these matters and applauds the agency’s willingness to offer notice and comment opportunities for guidance documents such as this notice.

Sincerely,



John W. McGraw

Director, Regulatory Affairs