

July 27, 2015

U.S. Department of Transportation
West Building, Ground Floor
Room W12-140, Routing Symbol M-30, 1200
New Jersey Avenue S.E., Washington, DC 20590

Delivered electronically via www.regulations.gov

RE: DOCKET NO. FAA-2015-1746 NOTICE OF PROPOSED RULEMAKING: CHANGES TO THE APPLICATION REQUIREMENTS FOR AUTHORIZATION TO OPERATE IN REDUCED VERTICAL SEPARATION MINIMUM AIRSPACE

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 FAA's Notice of Proposed Rulemaking (NPRM) regarding the FAA's requirements for an application to operate in Reduced Vertical Separation Minimum (RVSM) Airspace and we therefore appreciate the opportunity to submit comments.

The NPRM Executive Summary outlines the current requirement for any applicant for RVSM authorization to include such a program as part of the application for RVSM approval. This requirement was first promulgated in 1997, when most aircraft required significant design changes or inspections to qualify for RVSM operation. The FAA, therefore, required operators to submit a detailed plan for the maintenance of RVSM systems and equipment for FAA approval. Since then, RVSM operations have become much more common. RVSM systems are now incorporated into aircraft type designs or supplemental type designs, and operators must properly maintain those systems as part of their airworthiness obligations.

NATA members wholeheartedly agree with the NPRM and believe this action is long overdue. RVSM requirements are now fully integrated by design into aircraft, as evidenced by airframe Original Equipment Manufacturers' (OEMs) providing maintenance support information in the maintenance manuals. The OEM-provided maintenance program already contains necessary

RVSM tasks to ensure operators appropriately maintain RVSM system(s) along with the other aircraft systems.

Since U.S. RVSM airspace-operating requirements were implemented, the air carrier and the aviation industry in general has millions of hours of experience operating aircraft in accordance with Maintenance Programs (which already contain RVSM specifications) in RVSM-designated airspace around the world. Based on this experience; elimination of RVSM Maintenance Programs development, processing and approval, would be welcomed by the aviation industry.

Removal of Appendix G in title 14 CFR Part 91 General Operating and Flight Rules and the requirement for an RVSM maintenance program, will alleviate the burden and expense of developing, processing and approving RVSM maintenance programs.

NATA values the opportunity to participate in this important rulemaking activity and we applaud efforts by the FAA to increase efficiencies and reduce cost through this NPRM.

Sincerely,

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

John McGraw

Director, Regulatory Affairs