



January 13, 2018

Daniel K. Elwell
Acting Administrator
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

RE: Finalization of Rule; RIN 2120-AK28, Regulatory Relief: Aviation Training Devices; Pilot Certification, Training, and Pilot Schools; and Other Provisions

Dear Acting Administrator Elwell,

On May 12, 2016, the Federal Aviation Administration (FAA) issued the Notice of Proposed Rulemaking (NPRM) referenced above. Comments were due to be filed on or before August 10, 2016. As organizations representing the U.S. all-cargo air carrier, regional passenger and cargo airline industries and business aviation interests, we respectfully urge the FAA finalize this rule as soon as possible. We believe the finalization of this rule will not only provide much-needed regulatory relief, but also enhance safety by allowing pilots to acquire additional aeronautical experience and training in real-world situations.

As proposed, and as supported by several additional industry organizations the rule, in part, would allow pilots flying Second in Command (SIC) for Part 135 operations that require only one pilot to accrue flight time towards an Airline Transport Pilot (ATP) certification. We fully support this change and further urge that this relief also be applied to Part 135 operations involving high-performance, single-engine aircraft. The NPRM was silent with respect to the decision to limit this allowance to multi-engine aircraft. As noted in the comments filed by the National Air Transportation Association (Docket No. FAA-2016-6142-0086) and Regional Air Cargo Carriers' Association (FAA Docket No. FAA-2016-6142-0031), SIC flight time in revenue operations under the mentoring and supervision of an experienced Part 135 pilot in command is directly applicable to the type of flying that new pilots will be engaged in later in their careers than the other avenues noted in the NPRM. Further, current equipment suites in some high-performance single engine airplanes, like the Cessna 208, provide experience in advanced flight management system operations that are simply unavailable in many Part 135 multiengine airplanes. To exclude this source of rich, real-world IFR, weather, cross-country, and night flight experience in an airline-like environment from the rulemaking would be a

significant disservice to new pilots seeking to accrue hours in an operating environment more akin to an air carrier and would deny the industry an opportunity to help fill the pipeline with more experienced crewmembers. As a practical matter, there is no difference between allowing a pilot to accrue flight time when acting as an SIC in a multi-engine aircraft and that same pilot acting as an SIC in a high-performance, single-engine aircraft.

Again, we urge the FAA to finalize this rule as expeditiously as possible and extend this allowance to appropriately-equipped, high-performance, single-engine aircraft.

Thank you for your consideration.

Sincerely yours,



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Senior Vice President
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Vice President, Safety & Operations and Regulatory Counsel
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cc: Lirio Lu
Executive Director, Office of Rulemaking
Federal Aviation Administration