

August 25, 2016

Richard Mathews
Federal Aviation Administration
800 Independence Ave, SW Room 822
Washington, D.C. 20591

Delivered via electronic mail: Richard.Mathews@faa.gov

RE: ORDER AFS 8000.RCCB

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 agency's intent to establish the Regulatory Consistency Communication Board (RCCB) within the Aircraft Certification Service (AIR) and Flight Standards Service (AFS). We therefore appreciate the opportunity to submit comments.

NATA was a member of the Consistency of Regulatory Interpretation (CRI) Aviation Rulemaking Committee (ARC) established by section 313 of the FAA Modernization and Reform Act of 2012. One of the six CRI ARC recommendations was the establishment of a Regulatory Consistency Communication Board (RCCB). NATA applauds the FAA's development of the draft Order outlining guidance that defines the board's purpose and responsibilities.

Overall, the RCCB draft Order is an accurate representation of the structure articulated and agreed to by the ARC, and NATA supports its implementation. NATA believes the FAA should move forward with implementation of the Order in its current form so that internal and external stakeholders can see the board's value in addressing issues of regulatory inconsistency.

Feedback, review and validation of RCCB processes and outcomes will be essential in fine-tuning the operation of the board. For the agency to be held accountable for successful enactment of the RCCB, NATA recommends the FAA implement a periodic review of the

program to ensure its effectiveness. If time permits, and does not create a delay in the implementation process, we recommend including the requirement for a periodic review in the Order itself.

Such a review will allow stakeholders and the agency to determine, for example, whether a specific staff position should be created for ensuring the RCCB's desired outcomes are reached and sustained. While requiring the agency to identify such a position in the Order could cause a long delay in its finalization, it may ultimately be necessary if the periodic review proposed by NATA reveals a lack of follow-through and success.

NATA suggests the first such review occur one year after implementation. Participants in the periodic review should include FAA leadership, RCCB members, industry stakeholders, those directly involved in RCCB reviews (e.g. FAA field personnel, certificate holders), and others as appropriate. All parties should have the opportunity to provide feedback on the RCCB process and offer recommendations for improvement.

We appreciate the FAA's efforts to develop the draft Order and the agency's willingness to consider our views. We welcome the opportunity to participate in any future discussion on this important issue.

Sincerely,



John McGraw

Director, Regulatory Affairs