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July 8, 2013

US Department of Transportation
Docket Operations, M-30
1200 New Jersey Avenue, SE, West Building Ground Floor, Room W12-140
Washington, DC  20590

RE:  Notice of Availability: Request for Comments – Draft Airman Certification Standards (ACS) documents developed by the Aviation Rulemaking Advisory Committee (ARAC) Airman Testing Standards and Training Working Group (ATSTWG)

To Whom It May Concern;

The Aircraft Owners and Pilots Association (AOPA), on behalf of more than 400,000 general aviation pilots and members nationwide, submits the following comments on the draft Private Pilot and Instrument Rating Airman Certification Standards (ACS) documents.  AOPA had the privilege of co-chairing the Airman Testing Standards and Training Working Group and the resulting industry-led effort to make testing and training more relevant and meaningful.  We appreciate the opportunity to comment, in support of that initiative.

In September of 2011, the FAA chartered the Airman Testing Standards and Training Aviation Rulemaking Committee (ARC) to make recommendations on the content, process, methodology, and priorities for updating airman testing standards and training material.  AOPA was an active participant in that ARC and supported its recommendation to integrate knowledge, skills, and risk management for each major task of the current Practical Test Standards (PTS) into a single ACS document.  AOPA continues to contend that this approach will improve and integrate testing and training by clearly laying out for the prospective pilot the necessary aeronautical knowledge and risk management and linking those to the flight proficiency skills.

The integrated ACS combines into one, easily identifiable document, the skills a pilot must have with the knowledge they need to fly safely, and incorporates risk management throughout.  Simply put, the ACS is an effort to make the connection between the written and practical test and to bring relevancy to both and throughout the flight training paradigm.  Today, the knowledge and practical test are often seen as separate hurdles one must get over along the path to certification and prepared for independently.  Pilots often fail to connect how each test relates to one other and throughout their flight training.

Although the new ACS can appear to add significantly to the requirements for a certificate, AOPA contends it does not, but rather establishes a single document which a prospective airman can locate all he or she needs to know for all of their flight training and testing. The document could now be referenced from the very first introductory flight, throughout all training, the written test, and eventually the practical exam – better preparing the applicant for each phase along the way.

AOPA would like to commend the Agency and its willingness to listen to Industry in an effort to improve pilot training and testing. Prior to the ACS, there was no single document that testing referenced but rather a host of handbooks, regulations, advisory circulars, etc. With the adoption of a single ACS document, the tests, handbooks, and training materials will now be linked to a single source, making testing transparent, meaningful and more easily prepared for.

By taking the established and well thought-out Practical Test Standards and adding knowledge and risk management, the new ACS reinforces the skills needed to fly effectively and safely. There has been no reduction in the need for pilots to have fundamental stick and rudder skills and leaves it up to the trainers to teach them how they see appropriate. It remains paramount that individual flight training providers maintain their focus on the basics of controlling the aircraft safely and combine those skills with fundamental risk assessment.

The addition of risk management into the standard represents the incorporation of existing best practices and teachings currently out in the field. Although also referenced and located in the handbooks, the ARC and now working group strongly felt it needed to be part of every element of the standard. For many, risk management represents the "why" you need to know or be able to do something. Pilots need to know the risks associated with aviation, along with the skills to manage them, with the why they need both.

The ATST working group consisted of broad representation of many facets of general aviation – from pilot and instructor groups, aircraft manufacturers, universities, training material developers, on through many FAA divisions and branches. AOPA commends the effort of the group to modernize and update airman testing standards and training. The ACS documents represent a step in the right direction towards the ultimate goal of reducing fatal general aviation accidents by ensuring future pilots possess the knowledge, skills, and risk management needed to fly safe.

AOPA looks forward to participating in future refinement and development of the Airman Certification Standards and believes the work represents a solid partnership between the Agency and Industry. We will continue to ask the Agency act upon the

remaining recommendations from the ARC and involve and coordinate with Industry on any future changes to testing and/or training standards.

Additionally, the new ACS and recommended test mapping will serve as an excellent platform for a comprehensive Quality Management System (QMS) which will reduce reactionary changes and move towards a proactive system for both testing and training. All of which will be transparent to both government and industry, but most importantly, the prospective pilot.

AOPA appreciates the opportunity to provide comments on these draft Airman Certification Standards and stands committed to continuously improving airman testing standards and training.

Sincerely,

David Oord
Manager, Regulatory Affairs