



Mark R. Baker
President and CEO

January 13, 2015

The Honorable Anthony Foxx
Secretary, Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Secretary Foxx,

I write today on behalf of more than 350,000 members of the Aircraft Owners and Pilots Association (AOPA) who are frustrated by the long wait for third-class medical reform. This issue is of the utmost importance to our members and has significant economic implications for the entire general aviation community and beyond. Proposed medical reforms, which simply seek to expand on a standard used successfully for a decade, have been under review for three years, making it incomprehensible to many in the aviation community that no action has yet been taken.

While we laud the FAA for its deep and detailed analysis of the data and its subsequent recommendation to move forward with reforms, we are exasperated that those efforts are now bogged down in the Department of Transportation. The FAA's proposed rule entitled Medical Self-Evaluation for Certain Noncommercial Operations in Lieu of Airman Medical Certification has now been in the hands of the Department of Transportation for almost seven months as part of a mandatory review process that is supposed to take no more than 90 days.

The delays are particularly maddening when the proposed rule is likely so closely based on a standard that has been used by thousands of pilots for more than a decade.

Since 2004 when the FAA adopted the Sport Pilot rule, pilots have been able to fly many types of small, light airplanes recreationally without needing to go through the expensive and often cumbersome third-class medical process. Five FAA Administrators and four Secretaries of Transportation, from both political parties, have had oversight of the current and successful Sport Pilot Rule.

Allowing pilots to fly without going through the third-class medical process is safe. The FAA's proposed rule would simply extend this standard to more pilots flying more types of small aircraft.

AOPA is not alone in its support and pursuit of medical reform. More than 180 bipartisan members of Congress cosponsored legislation, the General Aviation Pilot Protection Act, which supports third-class

medical reform. The major general aviation associations and ownership type clubs also support reform efforts and have written to you requesting expedited review. Additionally and perhaps most importantly, the Flying Physicians Association and the AOPA Medical Advisory Board, whose members are both doctors and pilots, have written to you in support of this effort.

Allowing reform to move forward would save both pilots and the federal government time and money while boosting participation in general aviation—an industry that contributes \$150 billion and more than 1.2 million jobs to the national economy but is struggling, in significant part, because of the high cost of flying.

AOPA estimates that medical reform, as proposed under GAPP, would save pilots \$24.6 million every year. A conservative estimate also shows an annual savings of \$1.9 million to the FAA. The resources now being used on the FAA medical certification process could be reinvested in ways that do far more to enhance safety, including increased proficiency flying and installing new safety equipment on aircraft. Pilots value their own safety and that of their passengers which will continue to be true with or without the third-class medical requirement.

Over the past decade, general aviation has lost an average of 6,000 pilots per year. Making flying more affordable, as medical reform would do, would help thousands of people start flying and keep flying, helping to create jobs and support airports, aviation businesses, aircraft manufacturers, and other industries that rely on aviation activity.

We routinely hear from members who tell us that they are no longer flying because of the significant cost associated with obtaining and renewing the medical certificate coupled with the fear of being denied or deferred. Each year about 40,000 medical applications are deferred to the FAA for further evaluation. Of these only a tiny portion are ultimately denied—284 in 2012. But once an application has been deferred pilots can spend months and tens of thousands of dollars having repeated medical tests, providing documentation, and resubmitting paperwork in order to get their medical certificate. In the meantime, they are grounded, eroding their piloting skills and decreasing GA activity.

Pilots who receive third-class medical certificates undergo an aviation medical exam only once every two or five years depending on age. In between these exams, and before every flight, pilots must assess their own fitness to fly—something they will continue to do with or without a medical certification requirement. To ensure that pilots continue to have the information needed to self-assess their fitness to fly and to maintain the current and profound emphasis on safety, AOPA is developing a comprehensive online course to educate pilots further and deliver the tools they need to make a reliable self-assessment. This training will be free to the public. Coupled with an open and honest relationship with one's primary care doctor, this training will enhance, not degrade, aviation safety.

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Even without a medical certification requirement, pilots will still be required to undergo an evaluation with a flight instructor at least every two years to act as pilot in command. During these flight reviews, instructors evaluate each pilot's cognitive condition, as well as his or her physical ability to safely operate an aircraft. If either is in question they do not endorse the pilot.

Our members, the general aviation industry, members of Congress, and the American people are frustrated with our government's inability to move efficiently and effectively on issues that will improve safety, save money, and help create jobs and support local economies.

On behalf of our members and the aviation community we must ask, when will the Department of Transportation allow third-class medical reform to move forward?

After three years of scrutiny and analysis, the time to take action is now.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark R Baker', with a long horizontal flourish extending to the right.

Mark R Baker

AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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