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Jim Viola  
Manager, General Aviation and Commercial Division (AFS-800)  
800 Independence Ave., S.W.  
Washington, DC 20591

RE: Notice of Policy Change for the use of FAA Approved Training Devices

Dear Mr. Viola,

I am writing on behalf of the members of the Aircraft Owners and Pilots Association to raise serious concerns about the Agency's recent notice of policy change for the use of approved training devices. We believe the policy change will detrimentally effect safety; significantly raise the costs of training; and will have a negatively impact technological advances.

The stated vision of the FAA is "to reach the next level of safety, efficiency, environmental responsibility, and global leadership." This policy change seems to have lost sight of that vision and succumbed to legal interpretation. Simulator training for an instrument rating allows instructors to improve training through better scenarios, multiple procedures, and adaptability. Training in a simulator focuses a pilot on interpreting instruments and procedures; more effective than compared to flying in day VFR conditions using a view limiting device. By reducing simulator training from 20 to 10 hours safety will be negatively impacted.

An airplane's rental cost is the most expensive part of any certificate or rating and is significantly more expensive when compared to a simulator. Flight schools have long used simulators as a way to reduce the cost of an instrument rating while improving the quality of training. Additionally, Part 121 operators have evidenced the efficacy and savings simulator training provides and several Civil Aviation Authorities have successfully used the multi-crew pilot license as a means to better train pilots using simulators.

The explosive growth and advancements of simulators can be attributed to the flight training community recognizing the usefulness of the devices coupled with the reduced costs to pilots. Pilot proficiency and training has greatly benefited from greater availability and fidelity of these devices yet we fear this new policy statement will impede the technological advances for general aviation.

Regardless of how an airman is trained, he or she must be evaluated during the practical exam to ensure they possess the right knowledge, skills, and risk management needed for a certificate or rating. The Agency should afford the training industry the flexibility to train pilots using a variety of new and innovative ways. Only through new thinking and innovation will we collectively rise to the next level of safety.

For all of the reasons above, we respectfully request the FAA (1) immediately rescind the new policy statement, (2) initiate expedited rulemaking to allow for 20 hours credit for an instrument rating, and then, once that rulemaking is finalized, (3) reissue LOAs using current guidance, regulations, and standards.

Sincerely,

David Oord  
Manager, Regulatory Affairs  
Aircraft Owners and Pilots Association