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

RE: Docket Number FAA-2015-1846 Notice of Proposed Rulemaking; Aviation Training Device Credit for Pilot Certification

To Whom It May Concern,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submits the following supportive comments on the Federal Aviation Administration's proposed rulemaking for aviation training device (ATD) credit for pilot certification. We believe the policy change will positively affect safety; significantly reduce the costs of training and certification; and will positively impact technological advances.

## **BACKGROUND**

On January 2, 2014 the FAA published a policy change for the use of approved aviation training devices (ATDs), FAA-2013-0809. The policy change reversed decades of expanded use of such devices in pilot training. In response, the agency received more than 200 comments opposing the policy change, including many asking for expedited rulemaking to align the regulations with long-established policy, previously implemented through letters of authorization (LOA). In publishing the direct final rule on December 3, 2014, the FAA responded positively to AOPA and the vast majority of other commenters who asked that the flight training industry be allowed to continue maximizing the use of ATDs for instrument flight training. That rule change would have allowed the industry to train safe, competent pilots in a structured and economical way.

In a January 15, 2014 withdrawal notice, the FAA said it had received adverse comments and was therefore obligated by 14 C.F.R. §11.13 to withdraw the direct final rule. AOPA respects the rulemaking process, is an active participant in it, and appreciates the benefits of public comment through that process. However, we were disappointed that the adverse comments forced the withdrawal of the direct final rule, with negative consequences for pilot training. The adverse comments were demonstrably inconsistent with significant and longstanding practical experience that has established as fact the economic, environmental, and safety value of allowing a maximum of 20 hours of time in an approved ATD to count toward the requirements for an instrument rating.

## **SAFETY BENEFITS**

The stated vision of the FAA is "to reach the next level of safety, efficiency, environmental responsibility, and global leadership" and this proposed rule change will further that vision.

Simulator training for an instrument rating allows instructors to provide a safer, more effective training experience. Students using ATDs are exposed to more complex scenarios, may be subjected to conditions not otherwise available at their local airport, can safely practice for emergencies, and have the opportunity to practice their new skills by "flying" more procedures. Training in a simulator focuses a pilot on interpreting instruments and procedures in a way that is more effective than flying in day VFR conditions using a view limiting device.

Furthermore, this proposed rule is consistent with the FAA's own stated policy on the use of simulators in pilot training and national policy for fuel conservation. In the Aircraft Flight Simulator Use in Pilot Training, Testing, and Checking and at Training Centers Final Rule, published July, 2, 1996, the FAA provided the following:

Flight simulation technology has shown enormous advancement during the past 30 years. The Federal Aviation Administration (FAA) has permitted greater use of aircraft flight simulators and flight training devices in training, testing, and checking airmen. The increased complexity and operating costs of the modern turbine-powered aircraft and the current operating environment have created an even greater need for the use of flight simulators and flight training devices. In many cases, flight simulators have proven to provide more in-depth training than can be accomplished in the aircraft. The use of flight simulators and flight training devices in lieu of aircraft has resulted in a reduction in air traffic congestion, noise and air pollution, and training costs. The increased use of flight simulators is also consistent with the national policy for fuel conservation.

Flight simulators provide a safe flight training environment. They may reduce the number of training accidents by allowing training for emergency situations, such as fire, total loss of thrust, and systems failures that cannot be safely conducted in flight. The FAA has traditionally recognized the value of flight simulation and has awarded credit for the completion of certain required training, testing, and checking by use of simulation.

### **COST BENEFITS**

Airplane rental and fuel are the most expensive part of any certificate or rating and are significantly more costly than simulator time. Flight schools have long used ATDs as a way to reduce the cost of obtaining an instrument rating while improving the quality of training by focusing on instrument interpretation and scanning – a key skill with today’s modern “glass” cockpits and avionics. Additionally, commercial air carriers have demonstrated the efficacy and savings of simulator training, and several Civil Aviation Authorities have successfully used the multi-crew pilot license as a means to train pilots using simulators – further expanding, not limiting, their use.

### **TECHNOLOGY ADVANCEMENTS**

The flight training community has recognized the value of ATDs both for their unique role in an effective training program and for their ability to reduce total training costs. The result has been explosive growth in the use of ATDs along with significant advances in technology. Pilot proficiency and training has greatly benefited from the widespread availability and increased fidelity of these devices and this rule change will allow for continued improvement and advances in training devices used in general aviation.

### **SUMMARY**

Regardless of how training is conducted, each airman must be evaluated during the practical exam to ensure he or she possesses the knowledge, skills and risk management needed to hold the desired certificate or rating. The new integrated, holistic Airman Certification Standards (ACS) will ensure future pilots possess those aspects and make them safe, competent aviators. This rule change will afford the training industry the flexibility to teach pilots using new and innovative techniques. Only through that innovation will we collectively rise to the next level of safety.

For all these reasons, we respectfully ask the FAA to expedite publication of a Final Rule which will, once again, set the maximum ATD time that may be credited toward the instrument rating at 20 hours under 14 C.F.R. §61.65(i). The publication will re-establish modern flight training practices, techniques, and levels of safety.

Sincerely,



David Oord  
Vice President, Regulatory Affairs  
Aircraft Owners & Pilots Association