



## AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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September 7, 2005

Office of Information and Regulatory Affairs  
Attn: FAA Desk Officer  
Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

### **RE: Proposed Survey of Airman Satisfaction with Aeromedical Certification Services**

The Aircraft Owners and Pilots Association (AOPA), representing over 404,000 members opposes a planned Federal Aviation Administration's (FAA) survey intended to gauge pilot levels of satisfaction with aeromedical services. The proposed survey squanders limited FAA resources, duplicates existing customer survey efforts undertaken by AOPA and other industry groups, and is completely unnecessary. Dissatisfaction levels related to aeromedical certification delays experienced by pilots are well documented and federal resources would be better spent in reducing the current medical processing backlog, which can exceed five months!

In fact, the proposed survey is seriously flawed in that it fails to capture this segment of the pilot population most likely to be dissatisfied with the FAA's medical certification services, those whose medical certificate has been deferred or denied.

#### **Aeromedical Problems Already Documented**

AOPA has conducted surveys on medical certification services in 1998 and again in 2003. The surveys revealed that 67 percent of the respondents experienced more than a three-month delay in obtaining medical certification from the FAA, and this problem is only getting worse. The delays for pilots whose cases require review through the FAA Aerospace Medical Certification Division (AMCD) now take in excess of 120 days, and in some cases more than five months before a response is received. At any given time, the backlog can exceed 100,000 medical applications, creating a serious hardship for pilots and aircraft owners who experience the delay.

To remedy this situation, AOPA has asked the FAA to modify its certification policy for certain medical conditions and to expand the Aviation Medical Examiner Assisted Special Issuance (AASI) program to include other low risk pathologies. AOPA believes that implementing these changes will reduce the backlog of medical review cases, which accounts for most pilots' dissatisfaction with FAA medical certification services.

AOPA and the FAA know that these delays in medical certification is where the problem resides, another survey is not needed to tell us that. AOPA has collected extensive data and feedback from pilots on medical certification issues that is an invaluable (and free) resource for the FAA to use in evaluating the agency's medical services performance and identifying needed improvements.

#### **FAA Proposed Survey Will Not Provide Accurate Information**

In addition to being unnecessary, the FAA's proposed survey is flawed because it will not

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accurately identify those pilots that are dissatisfied with the FAA's services and would therefore yield skewed statistics. The FAA proposes to distribute 16,000 surveys to a stratified sample of the 387,305 most-recent applicants for medical certificates of all classes.

By its own estimates, the FAA believes that only 10 percent of all respondents will have had dealings directly with the FAA. Of that group perhaps only half, or 5 percent, will have dealt with the FAA in a substantive way about their medical condition (medical application deferred to AMCD for review). Thus, of the 16,000 solicited respondents, only about 800 will be solicited from those pilots who have had a substantive interaction with the FAA. A 10 percent response rate would result in a total of 80 responses.

This level of response is inadequate to properly assess the FAA's performance. According to the FAA, the degree of accuracy needed for this survey is  $\pm 3$  percent with a 95 percent confidence. The number of useable returns required to achieve that accuracy is 640 surveys overall. With only 80 responses from the group of pilots who have had substantive interaction with the FAA, it becomes very clear that the FAA will not achieve the desired accuracy for this segment of the pilot community. Furthermore, since no standard for response rate at this level is contemplated, it is possible that normal variations in respondent behavior will produce an even lower actual response rate.

We further believe that the pilot community that receives and passes a physical exam from an AME is likely to be overwhelmingly positively disposed to their providers and, thus, a survey at that level will produce meaningless results.

### **Reduce the Delays Instead**

AOPA opposes the FAA spending its limited budget on this unnecessary survey. The FAA estimates the Airman Satisfaction Survey will cost the agency \$92,000 and the pilot community an additional \$197,000 investment in time to respond to this survey. The FAA's resources would be better spent on addressing the known problems associated with special issuance delays and the growing backlog of medical review cases.

For these reasons, we believe that the FAA should abandon this survey plan and fix the known deficiencies. As noted above, AOPA has previously asked the FAA to modify its certification policy for certain medical conditions and to expand the AASI program to include other low risk pathologies. AOPA believes that implementing this and other changes will reduce the backlog of medical review cases, which will improve customer satisfaction with FAA medical certification services.

Sincerely,



Luis M. Gutierrez

Director, Regulatory and Certification Policy