



## AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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July 24, 2006

Frederick E. Tilton, M.D.  
Federal Air Surgeon  
Federal Aviation Administration  
Office of Aerospace Medicine  
800 Independence Ave., SW  
Washington, DC 20591

Dear Dr. Tilton:

The Aircraft Owners and Pilots Association (AOPA) requests that the Federal Aviation Administration (FAA) reconsider its long-standing policy that disallows all use of antidepressant medications. AOPA believes that the FAA should consider those pilots who have a demonstrated history of continued stability and showing no adverse symptoms while using psychotropic medications, specifically selective serotonin reuptake inhibitors (SSRIs) for a special issuance of a third class medical certificate.

The civil aviation certifying authorities in Australia (CASA) have allowed certification of flight crewmembers and air traffic controllers that are using SSRIs since 1989. Although CASA's policy was not formalized until 2001, the compiled data of 481 cases did yield evidence suggesting that the use of antidepressants in carefully screened and well-monitored airmen can safely be undertaken without compromising aviation safety. A smaller study conducted by Transport Canada among military aviators reached a similar conclusion.

Drs. Chaturvedi, Canfield, and Whinnery of the FAA Civil Aerospace Medical Institute conducted an extensive review of published literature covering several years related to SSRIs and their effects on depressed and non-depressed patients. The results of the review indicated some favorable observations.

- Fluoxetine (Prozac) and sertraline (Zoloft) improved cognitive function in depressed patients.
- Paroxetine (Paxil) was effective in improving performance in older depressed patients.
- Sertraline was found to have no effect on either cognitive or psychomotor performance in non-depressed patients.

The results of the Australian and Canadian experience and the conclusions of aviation medical experts clearly favor the use of SSRIs under controlled conditions. Because of these encouraging results, AOPA believes that this is an opportune time for the FAA to change its policy regarding the use of certain SSRIs.

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AOPA offers the following protocol to the FAA for special issuance consideration for persons taking antidepressants.

- Third class medical certificate only;
- Complete and current psychiatric consultation by board certified psychiatrist;
- Only one psychotropic medication being used;
- For DSM IV diagnosis including major depressive disorder (single episode and recurrent) and dysthymic disorder;
- Initial documented stability on medication for 10 weeks with no adverse side effects, including sedation;
- On continuous therapeutic medication with documented stability for at least 6 months;
- For applicants who have been treated by their primary care physicians for at least 6 months, an evaluation by a board certified psychiatrist may be provided to confirm the treating physicians' reports verifying stability and no adverse side effects during the treatment period;
- If any change occurs in the treatment regimen during the 6-month monitoring period, the monitoring period must be reestablished for another 6 months;
- After special issuance certification, semi-annual evaluations from the treating physician or nurse practitioner should be submitted annually to the FAA at the time of authorization renewal.

AOPA and its Board of Aviation Medical Advisors developed this SSRI protocol, and we believe that the protocol is consistent with generally accepted medical and psychiatric practices and would not compromise aviation safety. By granting our request to approve the use SSRIs for special issuance, the FAA would encourage pilots on SSRIs to fully disclose their condition and would give the FAA a level of assurance that pilots that fly while taking SSRIs have had their condition evaluated and are determined not to pose a threat to aviation safety.

Gary Crump, AOPA Director of Medical Certification and I would like to meet with you and Dr. Fraser to discuss this recommendation and other medical certification initiatives. I will be in contact with you shortly to schedule a meeting.

Sincerely,



Luis M. Gutierrez  
Director  
Regulatory and Certification Policy