February 10, 2006

Mr. Arthur Andreassen
Assistant Vice-President
Revenue and Performance Indicators
NAV CANADA
P.O. Box 3411, Station "D"
Ottawa, ON
Canada K1P 5L6

Re: Notice of New and Revised Service Charges

Dear Mr. Andreassen:

On behalf of over 407,000 active general aviation pilots in the United States of America, the Aircraft Owners and Pilots Association (AOPA) has reviewed the NAV CANADA Notice of New and Revised Service Charges and is opposed to the proposal. AOPA files these comments on behalf of our members who fly in Canada and in support of the 18,000 members of AOPA's affiliate organization the Canadian Owners and Pilots Association (COPA).

The NAV CANADA proposal underscores why AOPA opposes a user fee based system in the United States. The U.S. national air transportation system is well served by the stable funding stream provided by the existing combination of taxes and general fund contribution. The rationales given in the NAV CANADA proposal to implement additional fees illustrates why a user fee system does not provide stable funding and reinforces AOPA's stance that congress (or parliament in the case of Canada) is the appropriate "board of directors" for a national air transportation system.

AOPA respectfully requests that the proposal to introduce daily charges on general aviation at the proposed airports be abandoned. AOPA contends that costs to collect fees from non-Canadian aircraft owners will be difficult. This raises questions as to whether the fee collection expenses (labor, international postage, and other costs) would exceed the fees charged, especially for non-Canadian general aviation users.

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Keeping the best interests of our membership in mind, AOPA has steadfastly maintained a position against user fees. We find no reason to support a different funding system in a foreign country, and we encourage NAV CANADA to reconsider the proposal, and not implement the proposed new fees.

Sincerely,

Andrew V. Cebula

**Executive Vice President** 

Government Affairs