



## AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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September 3, 2003

Mr. Nicholas A. Sabatini  
Associate Administrator for Regulation and Certification  
Federal Aviation Administration  
800 Independence Ave., SW  
Washington, DC 20591

Dear Mr. Sabatini:

The Aircraft Owners and Pilots Association (AOPA), on behalf of its over 400,000 members is participating on the Federal Aviation Administration's (FAA) Flight Simulation Device Aviation Rulemaking Committee (ARC) that is tasked with reconciling public comments to the FAA proposal to amend current flight training device (FTD) qualification requirements, to include establishment of increased regulatory oversight of all operators. The proposal includes mandatory quality assurance program, maintenance and record-keeping requirements for continued operational approval of FTDs. This single standard applies to the entire spectrum of flight schools, from the small general aviation flight school to the large airline-training academy.

AOPA opposes the proposed rules applicability to level 1-3 FTDs, which are in wide use in general aviation flight schools. The new requirements will significantly increase the complexity and operational expenses for schools and translates into an overall increase in the cost of general aviation flight training, with no safety benefit. For years, general aviation schools have used FTDs to enhance flight training under the FAA's current rules and advisory circular guidance without incurring any known safety problem. The use of FTDs gives general aviation pilots access to important procedures and proficiency training opportunities in a safe environment that helps enhance safety.

AOPA recently participated in the weeklong Flight Simulation Device ARC meeting and was not satisfied with the outcome. Although the AOPA fully supports the ARC's decision to exclude level 1-3 FTDs from the final rule, which we advocated for in our comments to the rule, we are very concerned about the implementation of the new requirements. This concern is based on the fact that the FAA has no policy in place for the disposition of the existing level 1-3 FTDs, nor a process for approving those devices once the rule becomes final.

To illustrate the importance of this issue to our members, in a recent survey, AOPA contacted 20 general aviation flight schools to determine the effect of the proposed rule on the use of FTDs. The 18 schools that responded operate a total of 47 FTDs, with two FTDs exceeding level 3. While this survey is not all-inclusive, it does indicate that schools actively use level 1-3 FTDs to provide a well-rounded general aviation flight-training curriculum. These schools would not be able to meet the onerous quality

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assurance, maintenance and record-keeping requirements of the proposed rule and, as a result, the use of FTDs to enhance flight training would be compromised.

AOPA requests that the FAA include in the final rule a policy that describes how currently approved level 1-3 FTDs will be authorized to operate and the procedures for new approvals. The policy should make allowance for issuing waivers for level 4-6 FTDs on a case-by-case basis.

Again, thank you for the opportunity to provide input to such an important ruling. If you need additional information please feel free to contact AOPA's Director of Regulatory Affairs, Luis Gutierrez at 301-695-2086.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melissa Bailey', with a stylized flourish at the end.

Melissa Bailey  
Vice President  
Regulatory Affairs