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

RE: Notice of Request to Comment – Aviation Rulemaking Advisory Committee Airman Certification System Working Group

To Whom It May Concern;

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submits the following comments on the draft Airman Certification Standards (ACS) documents. AOPA is privileged to chair the Airman Certification System working group (ACS WG), which developed the draft standards, representing a joint effort to make pilot testing and training more safe, relevant, and meaningful. We appreciate the opportunity to publically comment in support of this initiative.

In September of 2011, the FAA chartered the Airman Testing Standards and Training Aviation Rulemaking Committee (ARC) to make recommendations on the content, process, methodology, and priorities for updating airman testing standards and training material. AOPA was an active participant in that ARC and supported its recommendation to integrate knowledge, skills, and risk management for each major task of the current Practical Test Standards (PTS) into a single ACS document.

Responding to the ARC recommendations, the FAA Aviation Rulemaking Advisory Committee (ARAC) chartered the Airman Testing Standards and Training working group (ATST WG). AOPA was honored to co-chair the ATST WG, which drafted ACS documents for the private pilot and instructor certificates, instrument rating; a proposal to realign, streamline, and consolidate FAA guidance material; and sample knowledge test questions aligned to the knowledge and risk management sections of the ACS. The ATST WG completed its tasks and submitted its final report and recommendations to the ARAC in September of 2013 – all of which were unanimously accepted and transmitted to the FAA.

Formed in February of this year, the new ARAC Airman Certification System working group was tasked to finalize standards for the foundational pilot certificates, the instrument rating, and the instructor certificate; to align both guidance and sample test questions to the ACS; and assist the agency in transitioning from the current system to an integrated, holistic airman certification system that benefits from regular, structured expert stakeholder feedback.

An evolution of the current practical test standards (PTS), the integrated ACS combines into one easily accessible document the skills pilots must have with the knowledge they need to fly safely, and incorporates risk management throughout. By defining specific risk management behaviors that support the knowledge and skills for a given Area of Operation and Task, the ACS also increases the clarity and reduces the subjectivity of the undefined “special emphasis” areas in the current PTS. Simply put, the ACS provides the framework to make the connection between the knowledge (“written”) and practical tests, and to bring relevancy to both throughout the flight training process. The proposed ACS codes, shown for each task element in the published ACS documents, offer the practical means of aligning standards with guidance and test questions and for maintaining that alignment in a systematic and holistic way.

AOPA continues to believe that the new approach will improve and integrate testing and training by clearly laying out for the prospective pilot the necessary aeronautical knowledge and risk management, and linking those to the flight proficiency skills. Pilots training for any certificate or rating will clearly see what they need to know, and understand why they need to know it as well as how it will make them safer. By eliminating gratuitous information and providing a means for the FAA to develop meaningful and relevant test questions, AOPA also believes that the ACS approach holds promise for making the flight training and testing processes more efficient, more effective, and less costly.

Through the establishment of the airman certification system, aviation safety will be improved. This effort to improve airman testing, training, and certification also represents a new partnership between the agency and industry. By working together, we will help ensure pilots are better prepared to manage the risks associated with flying.

AOPA appreciates the opportunity to provide comments on this important industry-led effort.

Sincerely,



David Oord
Manager, Regulatory Affairs