



2 May 2016

Docket Operations, M-30
U.S. Department of Transportation (DOT)
1200 New Jersey Ave, SE Room W12-140
West Building Ground Floor
Washington, DC 20590-0001
Docket FAA-2015-1621

Dear FAA Representative:

The FAA's complete review and evolution of 14CFR§23 is critical to assuring the safety and vitality of general aviation in the United States and around the world. The importance of this effort cannot be understated and the signed aviation associations representing all aspects of general aviation are extremely supportive of the FAA's efforts to assure a brighter future for the general aviation community. With the comments of the aviation community in mind, the FAA must work swiftly to implement the changes being proposed in as short a timeframe as possible. With proper execution and prioritization, the FAA and U.S. Government can achieve a final rule that amends part 23 in the manner described before the end of 2016. This must be an absolute priority for the FAA and with the expected timeline pressures that the Presidential election will bring, business as usual will not be sufficient to achieve the goal of a final rule by the end of 2016.

On behalf of the aviation community, the aviation community would like to extend appreciation to the staff at the FAA who have understood to the concerns of the general aviation industry, who have worked so hard to implement the critical change being proposed. The process of creating this proposal was over 9-years in the making and it is clear the work that has been put into the proposal was worthwhile. To assure this critical goal is realized, GAMA has coordinated additional technical review with key stakeholders around the world. GAMA will provide detailed comments and suggested rule changes by the 13th of May. The signed aviation associations offer the following key comments.

General Comments:

The shift to a proportional and objective based rules within the part 23 framework will provide general aviation with the ability to more efficiently design, certify, produce, operate and maintain the airplanes of today and it will assure the future of general aviation will only be limited by human imagination. Working with key states of design to assure close harmonization of these new regulations is as important to the success of this process and the associations appreciate the FAA's leadership in this area. The FAA must make it a top priority to closely coordinate with aviation regulators at key states of design to assure that the general aviation industry can reach its full potential.

When one looks at the slow decline in general aviation activity, active pilots and the continual aging of the general aviation fleet, it is clear that the proposed changes are necessary to reverse these trends. While traditional rulemaking efforts have focused on specific technical regulations through myopic lenses, this proposed rule takes account of the entire general aviation ecosystem; it assures real world improvements can occur as opposed to other rulemaking activities which merely produce more documentation and administrative work. This revision of 14CFR§23 effort is a posterchild for good rulemaking and we applaud these efforts to fully understand the range of issues involved when making changes of this magnitude.

The proposals contained in NPRM 16-01 will allow for new products and retrofits to existing airplanes so that innovation which has previously been prevented by the nature of the existing rules can be made available. The NPRM has been crafted in a manner so as to allow the safe adoption of current and future technologies in an extremely efficient manner while assuring the highest levels of safety are maintained. The proposed changes to part 21 and 43 within the proposal are a lifeline to assuring that today's GA community can begin to implement the kinds of technologies and capabilities that should be reasonable to install, but for the outdated nature of the regulations. This update is no small feat and the general aviation community appreciates the work of the FAA in assuring an appropriate final rule by the end of 2016.

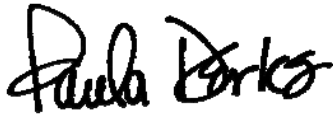
The aviation associations and their members have been heavily engaged in the development of globally valid design practices through ASTM F44, General Aviation Aircraft. It is of paramount importance that the objective level rules which have been developed are clearly implemented through detailed means of compliance which remain contemporary. The model of following industry based consensus standards affords the possibility of solving what has been a very daunting problem in the past. Trying to contain high levels of detail in regulation is beneficial at a snapshot in time but practically the day those detailed rules are printed, they will no longer meet all the needs of a dynamic industry. The approach of objective based rules implemented through detained consensus standards, which are also globally harmonized, is the key to assuring the success of general aviation.

In order to assure that the proposed process is as successful as possible, the FAA must dedicate time and effort to working with the FAA's internal team to assure the application of these new rules and the detailed methods of compliance that are accepted provide the efficiencies for both the FAA and

the aviation community. With good faith execution of the proposed changes the aviation community can begin to realise new modifications and new aircraft that will grow safety and draw people into general aviation.

As mentioned, GAMA will provide detailed technical comments to this proposed change by the 13th of May. Properly addressing these comments will be critical to the assuring the success of this effort and we look forward to providing this information shortly.

Respectfully,



Paula Derks
President
Aircraft Electronics Association (AEA)



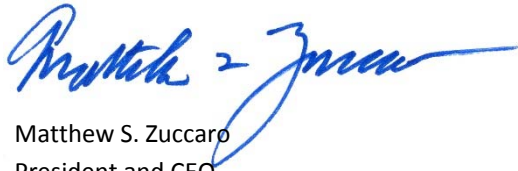
Mark Baker
President and CEO
Aircraft Owners and Pilots Association (AOPA)



Jack Pelton
Chairman & CEO
Experimental Aircraft Association (EAA)



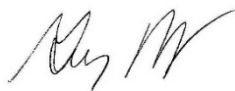
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