



October 23, 2014

The Honorable Anthony Foxx  
Secretary, Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

The Honorable Shaun Donovan  
Director, Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

Secretary Foxx and Director Donovan:

We, the undersigned members of the aviation Type Club Coalition (TCC), are writing to urge the Department of Transportation and the Office of Management and Budget to promptly and expediently review the FAA's Notice of Proposed Rulemaking on reforming third-class aeromedical certification.

The TCC is a collaboration of more than 30 individual Type Club organizations, each representing the owners of specific aircraft types. Our clubs foster community and mutual support among the operators of many different types of aircraft. A cornerstone of our mission as TCC members is to foster a strong safety culture through the education of our clubs' memberships. We believe that education is a far more effective tool than regulation in promoting aviation safety, and we do our part by developing and widely distributing operational best practices to the entire aviation community, not just our members.

We believe that a similar approach is appropriate when it comes to aeromedical certification for pilots of small aircraft used for personal and recreational purposes. Aeromedical education and self-certification has a proven track record within the sport pilot community for more than a decade, and other areas of aviation, such as glider, balloon, and ultralight operations, for far longer than that. The current medical certification process is unnecessarily bureaucratic and often requires applicants to endure the expenditure of significant time and money simply to prove what they and their doctors already know: that they are fit to fly. Many otherwise active pilots stop flying every year, not because they can't qualify for a medical certificate, but because the cost and effort of obtaining that certificate is too burdensome.

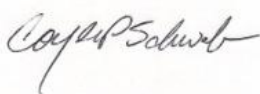
While Sport Pilot has been a successful program, it oftentimes requires airmen to transition into unfamiliar aircraft types in order to take advantage of it. As an organization dedicated to transition training safety for general aviation aircraft, the TCC recognizes that there are significant challenges inherent in the process of learning to fly a new aircraft type. We believe that allowing pilots to fly the proven and safe aircraft that they have logged the majority of their hours in under simplified aeromedical rules, rather than encouraging a transition to a new aircraft so that they may fly under Sport Pilot rules, is more effective from a safety of flight perspective.

We believe that by educating our members concerning aeromedical factors and empowering them to determine for themselves in consultation with their personal doctors whether they are medically able to fly, and not encouraging them to transition to aircraft in which they are unfamiliar as with Sport Pilot, we will be promoting and enhancing safety. Pilots will continue to evaluate their health before every flight. The proposal also encourages airmen to have an honest conversation with their doctors about their health, something the current FAA medical certification system discourages because of the bureaucratic process

that is triggered whenever any form of medical diagnosis or conditions is reported regardless of how benign it may be.

Reforming the aeromedical process for personal and recreational aviation will keep our industry strong while maintaining a high level of safety and will save the FAA money and resources that could be better utilized elsewhere. *We urge you to complete your respective departmental reviews within the next 30 days* so we can continue expediently and prudently down the path to positive reform. Thank you very much for your consideration in this matter, and please do not hesitate to contact us if we can be of assistance.

Sincerely,



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Chairman  
Type Club Coalition



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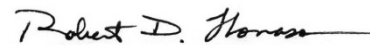
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