



United States Parachute Association



The Honorable Sam Graves
Chairman
House Transportation and
Infrastructure Committee
Washington, DC 20515

The Honorable Rick Larsen
Ranking Member
House Transportation and
Infrastructure Committee
Washington, DC 20515

The Honorable Garret Graves
Chairman
House Aviation Subcommittee
Washington, D.C. 20515

The Honorable Steve Cohen
Ranking Member
House Aviation Subcommittee
Washington DC 20515

February 19, 2024

Dear Chair Graves, Ranking Member Larsen, Chair Graves, and Ranking Member Cohen:

The undersigned organizations represent general aviation pilots, aircraft owners, and small businesses that safely conduct thousands of local non-stop sightseeing and skydiving flights in their communities. We write to highlight our concerns that, as currently drafted, Section 315 entitled *Air Tour and Sport Parachuting Safety* of the Senate's *FAA Reauthorization Act of 2023* (S. 1939) will, if enacted, have significant and insurmountable direct impacts on thousands of small general aviation businesses and the airports at which they operate.

In July, the House of Representatives passed, with broad bipartisan support, the *Securing Growth and Robust Leadership in American Aviation Act* (H.R. 3935) to reauthorize the Federal Aviation Administration (FAA) for the next five years. We appreciate, that under your leadership, H.R. 3935 was passed without similar provisions as S. 1939 that would negatively impact those conducting air tours and sport parachuting operations.

These small businesses safely conduct local flights following FAA regulations and provide an important commercial stimulus for airports and their surrounding communities through employment opportunities, fuel sales, and off-airport expenditures at surrounding businesses including restaurants and hotels. These flights also support the experience and mission of regional aviation museums that maintain the history while promoting the future of aviation throughout our country. These flights highlight the positive benefits of general aviation providing important touchpoints through recreation, tourism, and educational activities between airports and their surrounding communities. Moreover, our industry's activities promote interest and opportunities in professional aviation that benefit small businesses, local airports, and our entire industry.

Section 315 introduces requirements that would be nearly impossible and financially unattainable for these small businesses, resulting in their likely closure. If adopted, Section 315 would burden the FAA's limited resources with a flood of new certificate applications and the ongoing costs of administering flight operations under 14 CFR Part 135, diverting resources that currently oversee commercial point-to-point charter flights and other safety-critical functions.

The FAA has for decades permitted these flights through various regulations and the issuance of a Letter of Authorization (LOA) under 14 CFR part 91.147. FAA regulations also address pilot, aircraft, and operational qualifications for these types of activities. Additionally, these operators will fall under the FAA's requirements for the implementation of Safety Management Systems which further enhances a robust safety culture.

As safety is paramount to ensuring a thriving aviation industry, our organizations would welcome the opportunity to work with the FAA and Congress to address specific concerns as they arise.

In closing, our organizations have deep concerns that the proposed requirements, if enacted, are not scalable and do not support a data-driven approach to enhancing safety for these segments of general aviation. They will result in the closure of small aviation businesses without improving safety, and they will deprive the FAA of the resources and manpower needed to address priority issues. We respectfully request that the Senate's Section 315 provisions be omitted from any final FAA Reauthorization bill.

Thank you for your attention and support.

Collectively,

Aircraft Owners and Pilot Association

Experimental Aircraft Association

Commemorative Air Force

National Warbird Operators Conference

Parachute Industry Association

Professional Warbird Operators Association

United States Parachute Association

EAA Warbirds of America