



The Association of Professional Warbird Operators (APWO) is joining The Commemorative Air Force (CAF) and other historic aircraft owners, operators, and organizations in opposing Section 315 of the proposed Senate FAA Reauthorization draft. This section would require the FAA to administer an aviation rulemaking committee on considerations for new aircraft maintenance requirements. This committee would impose unrealistic and irresponsible requirements on air tour and parachute operations, as well as mandate the development of unnecessary and redundant pilot proficiency training, policies & programs.

The APWO is a non-profit organization focusing on the safe and professional operation of vintage aircraft. This organization, while representing our members and the warbird community, seeks to source and set the standards for best practices in improving maintenance, enhancing pilot skills of those operating warbirds, conducting aviation events, and participating in aviation related activities. Our organization and its members are considered to be a reliable and experienced authority in these areas.

While the proposed amendment certainly has detrimental direct impact, the unintended consequences are equally destructive. We have provided specific reasons as well as contributory impactors as reasons to remove the proposed regulations. These have been reviewed by the APWO and we agree that this proposed legislation would devastate the General Aviation (GA) industry by critically reducing overall aircraft operations at GA airports, causing lost jobs from recurring maintenance, and eliminating historically safe and reliable avenues for pilots to accumulate flight hours necessary to move to the airlines. The proposed language in Section 315:

- Strips FAA of regulatory authority and allows aircraft manufactures to impose maintenance requirements on ALL aircraft
- Ignores the available evidence that current FAA maintenance requirements are completely safe
- Presents no data that supports this proposal would improve safety for fixed or rotary tour operators, living history ride operators, balloon rides, skydivers and/or the general public
- Presents no evidence these provisions would have prevented past accidents
- Would increase costs, reduce revenues, and force hundreds of small businesses to close
- Is impossible for most operators of historic and vintage aircraft to comply with. Maintenance and tracking requirements of parts, engines and assemblies would not be possible, thereby completely eliminating these businesses
- Creates a barrier for new entrants and innovators in the aviation ride industry who would face higher costs, regulatory hurdles and requirements which are simply impossible to meet
- Creates an unreachable workload for already understaffed FAA personnel

Neither the FAA, APWO or CAF have identified specific safety issues or risks that justify the proposed requirements. We respectfully request that Section 315 is removed from the Senate FAA Reauthorization Draft proposal. We believe and have evidence to support that the current FAA maintenance standards are adequate and appropriate for ensuring the safety of air tour operations, skydiving and the general public. It is our hope that Congress would work with the FAA, vintage aircraft operators, air tour operators the skydiving industry and other stakeholders to develop more flexible and tailored solutions that address any specific safety concerns or challenges that may arise in the future. The APWO would be happy to act as a consolidator and central point of contact for these efforts.

Thank you for your prompt attention and support.