

January 28, 2019

John Duncan  
Deputy Associate Administrator for Aviation Safety  
Federal Aviation Administration  
800 Independence Avenue, S.W.  
Washington, DC 20591

Dear Mr. Duncan,

Over the last few weeks of the government shutdown, the effects of FAA staff being furloughed and therefore not in the office have begun to threaten the ability of non-governmental employees and training providers to continue flight training operations. Even though a temporary return to work has been established, the effects are going to cause some delays in returning to full service and could again become problematic if the temporary return to work is followed by any subsequent stoppage.

FSANA has identified the following requests that would greatly facilitate the continued provision of flight training and testing in the United States:

- **Renewal of expiring FAA Authorized 141/142 training programs letters of authorization and if applicable an AIR agency certificate** – Training programs that are authorized by the FAA under approved TCOs with expirations at the end of January or February are of specific concern at this time as they would no longer be able provide training under these programs. We also believe it is imperative that any simulator systems that require operational review by the FAA to issue any Statements of Qualification (SOQs) should be prioritized to avoid any lapse of the ability of training providers to continue to use these systems. If extensions or renewals are not able to be obtained either through normal FAA staff while they have returned to work or by local FSDO managers, those training providers will be required to halt the training they provide due to a lapse in their certificate and authorizations. In some cases lapses will actually cause more challenges for reinstatements or new approvals being required.
- **Extension of designee authorization or renewals** – AIR and AFS designees that have currency or renewal requirements that are unable to be processed or provided by FAA staff during the shutdown will directly begin to affect the ability of those designees to provide the services on behalf of the FAA. This is a critical time period where any services that can be provided by designees are of even greater importance while those services are unable to be provided by FAA staff. FSANA formally requests that extension of these privileges be authorized and communicated to designees until such a time as the normal staff is able to fully renew those designees and complete any currency training requirements.

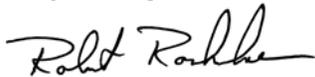
- **Extension of temporary airman certificates beyond 120 days** – Temporary airman certificates issued for ratings and certificates carry a 120 day period of validity which normally is sufficient time for FAA processes to issue permanent certificates. We understand that this will likely not be the case as a result of the recent shutdown and it will take some to catch up when back to full staff. These directly affect the ability of airman to exercise their certificate privileges, obtain training, or test for new ratings and certificates. To alleviate this challenge, FSANA requests that temporary airman certificates be authorized for a longer period of time.

While staff may be returning for at least a period of time, we recognize that it will take time for the FAA staff to catch up after the month long government shutdown. The requests can help alleviate the pressure caused on the staff as well as ensure the continuation of service provision by the aviation training industry.

In each of these cases, we understand that the effect is most felt at the expiration of a calendar month. January 31 is rapidly approaching and we request that these allowances be quickly reviewed and addressed where possible with a focus on affected service providers who will expire at the end of January and then those that will be expiring in February be addressed at the beginning of that month.

FSANA appreciates your consideration to these requests and is hopeful that in the near future, special measures will no longer be required. In the interim, please provide the needed relief for these concerns. Thank you.

Respectfully,



Robert Rockmaker  
President & CEO

CC Donald Trump  
Elaine Chao  
Dan Elwell