



February 4, 2025

The Honorable Sean Duffy
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Secretary Duffy,

On behalf of the National Air Transportation Association (NATA) and its more than 3700 member locations, I write to extend our sincere congratulations on your confirmation as the U.S. Secretary of Transportation and our desire to partner with you on policies and initiatives that further the efficiency and protect the safety of our National Airspace System (NAS). In light of the recent tragedies in Philadelphia and Washington, DC, NATA reiterates our solidarity with the Administration and the entire aviation industry in our shared commitment to ever-increasing aviation safety and ensuring we maintain the safest airspace in the world.

The general aviation industry supports 1.2 million American jobs; provides over \$247 billion in domestic economic output; and contributes to our nation's overall competitiveness, growth, and continued innovation. An essential lifeline to rural America, general aviation businesses operate at nearly 4,500 airports in thousands of communities that are not served by the airlines but are nonetheless impacted by major changes in industry activity. General aviation airports and the aeronautical service providers that support them aid local business development and job growth while supporting law enforcement, medical care, disaster relief, firefighting, and agricultural services.

NATA represents a broad cross-section of the general and business aviation industry, including on-demand air carriers, air medical operators, flight schools, aviation maintenance repair stations, aviation fuel suppliers and producers, fixed base operators (FBOs), and airport sponsors at general aviation airports. As the voice of aviation business for more than 80 years, NATA has focused on both advocacy and the elevation of industry safety and professionalism by examining contemporary issues, convening thought-provoking industry leaders on our policy committees, and pursuing solutions that prioritize aviation safety and economic viability. The following policy priorities reflect the direct input of aviation businesses and the recommendations of our member-driven policy committees.

FAA Reauthorization Act of 2024 Implementation

The bipartisan, bicameral FAA Reauthorization Act of 2024 addressed many of NATA's concerns about FAA efficiency and modernization while directing the Agency to implement common-sense, consensus policies to increase collaboration with industry, foster

American innovation, build our nation's skilled aviation workforce, and strengthen aviation safety. The bill specifically addresses NATA's concerns about regulatory inefficiencies and inconsistencies for certification and regulatory oversight of on-demand air carriers operating under CFR part 135—initiatives that will assist President Trump's efforts to increase government efficiencies and decrease regulatory oversight.

NATA's short-term efforts will focus on ensuring the FAA responds to these mandates in the timeframes specified by Congress. **We stand ready to assist the FAA with the following initiatives and ask for your leadership in guiding the Agency to much need action to:**

- improve FAA authorization of company check pilots for part 135 air carriers (Sec. 336);
- require part 91 tail end flights count toward pilot flight, duty and rest times (Sec. 351);
- ensure capture of and compliance with pilot flight times, rest periods, and duty times through recordkeeping changes for part 135 operators (Sec. 351);
- alleviate the part 135 certification backlog, which hinders small business growth, and report backlog status to Congress every six months (Sec. 818);
- and improve the process for adding aircraft to part 135 operations, fostering small business growth (Sec. 819).

NATA is also encouraged by recent FAA announcements regarding the expansion of operational authorities under part 135 (for scheduled service in larger and/or turbine aircraft) and the expansion of delegation authority for new certifications of part 135 on-demand carriers. We believe such expansion would allow industry to amplify government efforts rather than increasing government bureaucracy. **We offer our assistance in ensuring such expansion is carried out with the utmost commitment to safety and efficiency.**

Safety Management System (SMS) Implementation for Part 135

Last spring, the FAA published the final rule requiring Safety Management Systems (SMS) for part 135 air carriers. NATA has long advocated for SMS as a valuable tool to further our industry's commitment to aviation safety. Our Association is pro-actively working with the part 135 community to increase understanding of the new requirement and prepare carriers for implementation by hosting regular, free SMS events that bring operators and FAA officials together for information sharing. We believe such collaboration will ensure the best industry adoption of SMS, while assisting FAA with consistent and appropriate oversight. It is critical that the FAA workforce is trained within the same educational framework as the aviation businesses they will oversee to facilitate a smooth transition to the new standards and uniform application of evaluation criteria. **We request that you direct the FAA to continue to work closely with NATA to ensure both affected businesses and agency field personal understand compliance requirements and oversight.**

Public Charter Operations

For more than 45 years, the U.S. Department of Transportation's (DOT) part 380 public charter regulations have governed charter operations without controversy, allowing for a broad range of safe and secure air service options for U.S. consumers under FAA part 121 and part 135 safety regulations. The DOT part 380/FAA part 135 model allows diverse business models the flexibility to implement emerging technologies and provide much-needed air transportation services to rural communities across the nation, all while investing in under-utilized airports and infrastructure throughout the NAS.

These legal operations came under attack during the previous Administration, resulting in publication of a Notice of Intent (NOI) to revise the regulatory authority for public charter flights, potentially limiting their operation to part 121 commercial airline carriers. The regulatory activity failed to provide safety data justifying rulemaking; disregarded negative impacts on small businesses and rural communities; and threatened to put existing aviation businesses—who are in full compliance with current regulations—out of business.

NATA asks the DOT to focus on the many critical issues facing the NAS, such as modernizing safety equipment and deploying aviation innovation, rather than diverting resources to unnecessary rulemaking activities that lack full, transparent industry and community stakeholder engagement.

Aviation Infrastructure

To maintain general aviation's essential services and continue our industry's economic output, NATA recognizes the critical need for increased investment in aviation infrastructure and technology, with Agency accountability for efficient management of resources and funds. Our general aviation airports require both federal investment and increased public/private partnerships to meet current demands; modernize for the future; create highly skilled, well-paying jobs; and advance innovative technology.

NATA's aviation business members invest millions of dollars of private resources in our nation's airport system each year, but in many cases complex environmental reviews and multiple regulatory layers significantly impede developmental progress. Current NEPA review processes lack nationally synchronized standards and include unnecessary procedures that inhibit airport infrastructure projects and waste private investment resources. **We ask you to streamline land use policies, practices, and reviews to accelerate critical investment, infrastructure growth, and public/private partnerships—thereby reducing dependence on federal funds.**

Airports across the country also face threats of closure or restriction from local and state actions that directly challenge federal preemption of the NAS. Such actions not only threaten access to our nation's valuable system of approximately 5,000 public airports, but also weaken the safety of the NAS by establishing a complicated web of local aviation regulations and restrictions. **We ask that you direct the FAA to enforce legally binding**



federal grant assurances to protect access to our nation's valuable system of airports and maintain critical federal preemption of aviation regulations.

Of critical concern, NATA joins the entire aviation sector in calling for much needed investment in upgrades to FAA safety facilities, equipment, and staffing. Recent tragic events serve as a reminder that while the United States continues to maintain the safest airspace in the world, we cannot pause in our commitment to ever-vigilant, ever-improving implementation of best practices and innovative safety equipment. NATA believes the best way to maintain the American NAS as the global gold standard in aviation safety is swift investment in our current system, starting with Air Traffic Control. **Rather than pursuing policies that divide industry stakeholders, we ask you to protect this valuable national resource for communities large and small, the vast range of businesses who depend on it, and most importantly, all members of the traveling public.**

Once again, congratulations on your appointment as Secretary of Transportation. NATA is thankful for your strong leadership during this critical time for the entire aviation industry, and we stand ready to collaborate with you on these and other policies to strengthen American leadership, safety, and economic growth.

Sincerely,

A handwritten signature in black ink that reads "Curt Castagna". The signature is fluid and cursive, with a long horizontal stroke at the end.

Curt Castagna
President and CEO

Cc: FAA Acting Administrator Chris Rocheleau