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**U.S. House of Representatives Committee on Transportation and Infrastructure
Subcommittee on Aviation**

“FAA Reauthorization Act of 2024: Stakeholder Perspectives on Implementation”

December 11, 2024

On behalf of the General Aviation Manufacturers Association, thank you for the opportunity to testify on behalf of our membership on the implementation of the Federal Aviation Administration (FAA) Reauthorization Act of 2024 (P.L. 118-63). As the 118th Congress concludes its work and we look toward the holiday season, our membership is grateful and appreciative of the leadership, determination, and bipartisan effort that culminated in passage of the law in May.

We want to thank the leadership of the Subcommittee on Aviation, Chairman Garret Graves and Ranking Member Steve Cohen, the full Transportation and Infrastructure Committee (T&I) leadership, Chairman Sam Graves and Ranking Member Rick Larsen, as well as all the members of this Committee for crafting this significant piece of bipartisan legislation. I want to express a special note of thanks and appreciation to Chairman Garret Graves. He is held in high regard by the GAMA staff and membership, and we look forward to continuing to work with him as he leaves Congress and looks to take on his next great chapter.

The 2024 FAA Reauthorization is a tremendous accomplishment that should be lauded for its comprehensive nature and broad scope of issues it tackles. It should have a lasting impact given the strong foundation of consensus and bipartisan support it is built upon. If properly implemented, it will have a meaningful and positive influence on the aviation sector and general aviation community.

For GAMA, the legislation contains the key priorities that our membership advocated for including policies that advance safety, jobs, innovation, and global competitiveness in aviation.

The challenge now is to ensure that FAA prioritizes the timely implementation of the law and both Congress and the Administration stay the course and meet the funding and other requirements of this measure.

In the U.S., general aviation supports \$247 billion in total economic output annually and 1.2 million total jobs, with GAMA companies having facilities in 49 states. GAMA members include more than 140 of the world's leading manufacturers of general aviation airplanes, rotorcraft and powered-lift aircraft and their engines, avionics, components, and related technologies. GAMA members are also providers of maintenance and repair services, fixed-based operations, pilot and maintenance training, and aircraft management companies. Additionally, GAMA represents companies in the emerging sector of advanced air mobility (AAM), which includes the development of electric and hybrid propelled vertical take-off and landing aircraft and autonomous systems for civil purposes. Industry activity takes place at more than 5,000 public-use airports, connecting small and medium-sized communities to air service across the U.S. and supporting businesses, jobs and many diverse operations ranging from agriculture to law enforcement, fire, medical and other emergency rescue services.

At Altitude with Tailwinds

Since the law's enactment, the FAA has met several milestones and should be commended for their work. Some examples include the recent publication of the Special Federal Aviation Regulation (SFAR) for operating and licensing rules for powered-lift aircraft. This was an important step forward for the AAM sector and serves as a strong basis for bringing this innovation to the marketplace. Work remains to shape the permanent AAM regulatory and infrastructure framework, but a strong foundation to build on is in place thanks to the legislation.

The FAA also is moving forward on the cybersecurity provisions outlined in the bill by releasing a notice of proposed rulemaking for initial and continued airworthiness for transport category airplanes, engines, and propellers. Additionally, as directed by the bill, FAA and TSA have increased their collaboration on cybersecurity measures while respecting the lines of jurisdiction of the respective agencies with FAA taking the leadership role on aircraft, aircraft systems, and

air traffic. This approach aligns with National Security Memorandum 22 on Critical Infrastructure and the direction in the reauthorization.

Awaiting Takeoff Clearance

A central tenant of GAMA's reauthorization requests was to address challenges in the FAA's rulemaking and regulatory processes. The cybersecurity rule mentioned earlier has finally advanced thanks to continued attention from Congress. However, this rulemaking also underscores the problems in the rulemaking process given the FAA aviation rulemaking advisory committee submitted recommendations in 2016 which were promulgated and adopted by the European Union Aviation Safety Agency (EASA) in 2020. We will likely not see the FAA final rule until 2025.

As this Committee realized, a contributing factor in preventing safety and innovation from moving forward and benefitting the aviation system has been significant delays in the FAA's promulgation of rulemaking, policies, and guidance which has caused a large backlog of technical standards, policy memos, orders, and advisory circulars necessary for implementation. This delays the development of new products and disadvantages U.S. manufacturers in the international marketplace. Civil aviation is unique given that even minor changes that enhance safety are prohibited in the absence of government approved standards and guidance. In aviation, the biggest challenge to enabling efficiency is not to stop rulemaking and other regulatory materials related to the promulgation of safety and technical standards: instead, it is to find ways to move them forward in a timely, transparent, and accountable manner to facilitate advances in new technology and enhance U.S. aviation safety, leadership, and competitiveness.

One key element for addressing these obstacles was included in FAA Reauthorization: the establishment of the new Assistant Administrator for Rulemaking and Regulatory Improvement office. This office, reporting to the FAA Administrator and part of the management team, is designed to address key rulemaking challenges, improve coordination, and yield support for safety, innovation, and international leadership. Our understanding is the FAA is working internally to stand up this office and implement this important position, however, reprogramming of existing funds or specific requests for new funds may be required to fulfill this objective.

Our membership strongly supports the creation and integration of this office into the FAA organization, in an expeditious manner as well as establishing clear roles, responsibilities, and accountability. An effective rulemaking process, which includes promulgation of policies and guidance, is critical to ending FAA's own version of Groundhog Day on regulatory materials where in the absence of final rulemakings, they must promulgate the same special conditions and exemptions again and again on project after project.

An example of the importance of an effective and efficient rulemaking process is the FAA's Modernization of Special Airworthiness Certification (MOSAIC). The general aviation community is eagerly awaiting the final rule which was directed by Congress for implementation within two years but has been contemplated for much longer. This enabling rule will incentivize manufacturers to produce a broader scope of light-sport aircraft that can more efficiently incorporate safety enhancements and more versatility by expanding the existing and proven use of industry consensus standards. These changes will benefit many segments of our community, including manufacturers, pilots, aircraft owners, and the flight training community. We understand the FAA is on track to publish the MOSAIC rule, and we recognize the important role Congress has played in moving this forward. We encourage policymakers to continue to support the development and implementation of this important rule.

Additional work is also ahead for the FAA is to advance a rulemaking to normalize unmanned aircraft systems (UAS) beyond the visual line of sight (BVLOS). GAMA is supportive of the safe integration of BVLOS operation as noted in comments to the docket. Integrating UAS operation into the National Airspace System (NAS) through this BVLOS rulemaking over the next few years in addition to follow-on rulemaking activities to address larger aircraft and operations at higher altitudes will require that the FAA has an efficient and effective rulemaking process. The FAA should also have a way to evaluate and rapidly incorporate detect and avoid technology into UAS flight control logic to manage increasing demands from stakeholders across the aviation industry.

As an association that is also fortunate to represent companies that are headquartered all over the world, GAMA has also been a consistent advocate for safety cooperation and harmonization between bilateral partners to support the flow of commerce into the global marketplace. The FAA must ensure that aviation safety agreements, especially with leading aircraft states of design, deliver on their promise to enhance regulatory effectiveness and efficiency and support product delivery into the domestic and international marketplace. This remains critical as aviation products and safety enhancing technologies must be type certificated by the FAA to enter the domestic marketplace and validated with foreign authorities before being accepted into global markets. U.S. aviation has benefitted from a long-standing system that has facilitated the flow of aviation products based on aviation safety agreements rather than economic considerations. Strengthening that system should be a continuing focus of FAA and other aviation authorities. Recent decisions by FAA and other aviation authorities to establish performance metrics and make other improvements in the system are encouraging. We thank the Committee for helping to drive that progress.

In Chocks Awaiting Engine Start

There are also several important areas of interest where we are not yet seeing tangible progress, despite direction in the FAA Reauthorization to do so. GAMA advocated for many provisions that are critical to safety and technical expertise of the government and industry workforce, as well as efforts to better leverage federal investments and technologies to move the aviation sector forward.

For example, GAMA has consistently been a proponent of the FAA Aviation Workforce Development Program and strongly supports the FAA Reauthorization, which added an aviation manufacturing component to complement the existing pilot and maintenance programs. The industry faces a critical workforce shortage which must be addressed to maintain industry leadership. Prioritizing this investment will support the education and recruitment of aviation manufacturing workers and aerospace engineers as well as enhancing industry training and technical competence the aviation industry demands. While we celebrate the addition of manufacturing to this program, the reality is that appropriations funding is needed to move forward.

Continued training for FAA personnel and knowledge-sharing opportunities with industry are also crucial to bolstering the technical expertise of the FAA and enhancing their oversight capabilities. The FAA's technical competencies and resources correlate directly with the industry's ability to bring new products and safety enhancements to the marketplace. Continued strong funding is needed for FAA's aviation certification and safety activities and we urge the Congress and Administration to provide these resources and facilitate critical hiring and training.

We also applaud the reauthorization's focus and scrutiny of the Department of Transportation's (DOT) and FAA's telework policy. To properly conduct the agency's mission, the safety workforce should be physically located where and when they can effectively collaborate in-person and develop their professional and technical expertise through on-the-job knowledge transfer and to enable timely decision making for safety certification and conducting oversight activities. We look forward to the agency moving to address this directive.

The FAA Reauthorization also recognizes the importance of planning ahead to ensure that FAA is prepared to support the U.S. aviation activities of tomorrow. The FAA needs to work with industry to launch the Future State of Type Certification Process study mandated in the law. This study will propose ways to improve the safety, effectiveness, and efficiency of the certification process by better leveraging the use of digitization, modeling techniques, and software systems and developing a more robust risk-based approach for compliance and oversight activities. Additionally, the study will look at how to introduce safety improvements and corrective actions into the certification process and evaluate best practices and tools used by other certification authorities outside the U.S. This work has the potential to illustrate how technology and ingenuity can better serve the FAA's critical safety role in a more effective manner. This study will also complement other reauthorization provisions regarding utilization of advanced tools and modernization of transport airplanes and propulsion certification.

The pro-technology and innovation basis of the FAA Reauthorization is underscored by the provision that creates a pilot program to deliver clearances via mobile devices (e.g. tablets) through Internet Protocol. Previous FAA funded trials have illustrated this technology delivers

functionality and can be enabled safely and securely while simultaneously delivering fuel savings and operational efficiencies. The FAA needs to ramp up this pilot program, which builds upon prior agency research efforts, and will have great benefit for general aviation pilots and controllers as well as the overall system by making operations at key airports more predictable.

Managing Ground and Air Traffic

The reality is for our membership and the broader aviation sector to flourish we must also have a strong and sound U.S. air traffic system. This is a vital public good, supporting national security, small communities, and businesses across the country. A forward-looking vision for the FAA's management of the air traffic control system is essential. This is critical as FAA must keep pace with an evolving industry with current users and new entrants placing new and changing demands on the system. The FAA Reauthorization, if properly implemented, provides such a road map for increasing the efficiency of the system, enhancing the air traffic workforce, evaluating system capital investment needs and examining the consolidation or reorganizing of facilities and equipment.

The FAA Reauthorization required the creation of a program to further system design and operational approvals for remote towers, prioritizing airports without permanent towers and small and rural communities to expand air traffic services. We hope the Committee will continue its focus on this program.

As part of these continuing modernization efforts, GAMA strongly believes that the Administration and Congress should consider making changes to the administration of the Airport & Airway Trust Fund (AATF) that will give the FAA the ability to more effectively utilize the AATF balance, collected from aviation users, for facility upgrades and technology modernization. This initiative has broad stakeholder support, which is notable given past efforts to improve the air traffic system have not achieved such consensus and, therefore, hindered the ability to address these investments in a direct and constructive fashion.

Additional Flight Benefits

Collaboration has also been prevalent between government and industry in other areas. For example, recommendations of the federal interagency working group established by the bipartisan AAM Coordination and Leadership Act (P.L. 117-203) are likely forthcoming and represent a whole-of-government approach to integration and adoption of AAM. Our membership strongly supports this effort and hopes Congress will keep the Administration focused on the timely delivery of this report and its recommendations.

In a similar fashion, we also encourage consideration of the recommendations of the congressionally created Aerospace Supply Chain Resiliency Task Force to support supply chain stability and industry growth and competitiveness. This remains a challenge for our membership, and commerce, and is critical to address for the health and vitality of the international aviation marketplace.

Important Vector Check

On behalf of the membership of the GAMA, thank you for the role this committee and its leadership played in facilitating consideration and passage of the FAA Reauthorization Act of 2024. The steady hand and strong leadership of all involved to achieve this important milestone is to be commended and is deeply meaningful to the aviation sector and broader U.S. economy and commerce.

As we move forward, hearings and congressional oversight will continue to serve an important purpose – to highlight where there is success, where work remains, where focus needs to be placed, and where there are unanticipated challenges. It also serves as a compelling reminder to stay focused on implementation of this law especially during this time of transition. For this reason, thank you for the opportunity to provide a vector check for the FAA, industry, policymakers, and those who benefit from the robust aviation sector the U.S. is fortunate to have and must maintain. The fruits of your FAA Reauthorization labor have already been successful but there is work ahead to ensure that your vision can be more fully achieved, and the law's important direction becomes reality.