



Statement of
The Experimental Aircraft Association

Mr. Jack J. Pelton
CEO and Chairman of the Board

The Committee on Transportation and Infrastructure
Subcommittee on Aviation
The United States House of Representatives

Regarding
FAA Reauthorization: Securing the Future of General Aviation

March 9, 2023

Introduction

Good morning Chairman Graves, Ranking Member Cohen, and members of the Subcommittee. Thank you for inviting the Experimental Aircraft Association (EAA) to be here today and to provide our input on FAA Reauthorization: Securing the Future of General Aviation. My name is Jack Pelton and I am EAA's Chief Executive Officer and Chairman of the Board.

Founded on January 26, 1953, in Milwaukee, Wisconsin, as a local club for those who built and restored their own aircraft, EAA has developed to become a vibrant and growing international aviation community representing virtually the entire spectrum of recreational aviation. Today, EAA is headquartered in Oshkosh, Wisconsin, as a non-profit 501(c)(3) corporation, we encompass more than a quarter million members in more than 100 countries, with over 900 local chapters. The Chapter network is the backbone of EAA and is responsible for more than 14,000 aviation activities each year.

While the initial purpose of EAA was to aid and assist amateur aircraft builders, we now encompass all of recreational aviation and the promotion of aviation safety throughout general aviation. EAA initially established the segment of general aviation called experimental amateur-built, supporting those people that choose to build and fly their own aircraft. According to the FAA's General Aviation and Part 135 Activity Survey, the active fleet of amateur-built aircraft has grown more than 30% over the past 20 years. This proves that the homebuilding community is an essential growth sector of general aviation – with challenges across the general aviation industry over the past few decades this steady gain is an impressive accomplishment. Today, amateur-built aircraft encompass more than 17% of the entire active single-engine piston fleet, and every year our members add approximately one thousand new amateur-built aircraft to the National Airspace System.

As we celebrate our 70th anniversary this year, our mission remains unchanged. We are as dedicated to growing participation in aviation as our founders were in the beginning. We strive to make aviation easier, more accessible, more rewarding, and more fun – igniting and nurturing interest by embracing "The Spirit of Aviation" in all that we do.

In 2022 we celebrated the 30th anniversary of our Young Eagles program, which provides free introductory flights to youth through a well-structured program utilizing our chapters and members who volunteer to provide these flights. Acting on our mission of growing participation, Young Eagles has to date provided nearly 2.3 million flight experiences. That's millions of young people who have been introduced to general aviation, many who have then pursued careers as military or airline pilots, aerospace engineers or a host of other aviation related professions. This program has created a generation of people who have a deeper appreciation for aviation thanks to that free first flight.

EAA's focus on youth education also includes our Air Academy residence camp, our online AeroEducate portal for young people and teachers, and numerous other youth-focused aviation programs based within our local chapters and at our headquarters in Oshkosh.

In addition, EAA's annual convention, EAA AirVenture Oshkosh, is the world's largest fly-in event, with 10,000 aircraft gathering in Oshkosh along with an annual attendance surpassing 600,000, from more than 90 nations. It is THE gathering place for general aviation in America each summer, where new innovations and technologies are unveiled, and more than 1,000 forums cover all facets of aviation.

General Aviation's Value to the United States

The general aviation industry contributes an estimated \$247 billion in economic output and 1.2 million jobs in the United States. It provides a lifeline to many towns across the country and provides critical

services in times of natural disasters such as hurricanes, flooding, and wildfires. Our nation is served by more than 5,000 public-use airports, 13,000 private airports and airstrips, and 5,500 heliports across the country.

General aviation is an integral part of the transportation system that supports communities across the United States, especially in rural areas, by providing essential air travel options to businesses and the public, forging links between thousands of companies, their suppliers, and their customers. General aviation operations include emergency medical personnel and supplies delivery, disaster relief and recovery, search and rescue, agricultural aviation activities, recreational pursuits, personal transportation, and more. General aviation also supports commercial aviation through the training of a significantly large percentage of airline pilots.

The United States as a World Leader in Aviation

The United States' position as the world leader in aviation is established on the foundation provided by general aviation. For the United States to retain this leadership position, we must take action to ensure that our general aviation community remains healthy and robust.

General aviation typically serves as the gateway to almost all others facets of aviation. The nation's local airports, located in big cities, small towns, and rural areas repeatedly serve as the introduction to aviation for nearly everyone who enters or is associated with aviation. Ask any pilot or aircraft mechanic, commercial, military, or civilian, about how they were introduced to aviation, and it will likely involve an early encounter with general aviation at a local airport.

The United States' position as the leader in training of pilots and maintainers, designing and producing of new aircraft, and developing and implementing new technologies can only continue with a robust and healthy aviation industry, and that must include a robust and healthy general aviation component.

Challenges and Opportunities Facing General Aviation

A key component to the success of the aviation industry in the United States is to have effective, efficient, timely, and consistent regulatory oversight. The Federal Aviation Administration (FAA) serves as the regulatory agency with responsibility for the National Airspace System (NAS) and safety must always be its primary focus. To do so, the FAA oversees almost all aspects of aviation including air traffic control, aircraft design, production and maintenance, pilot, mechanic and crew certification, airport operations, and installation and maintenance of navigation aids.

Many sectors of general aviation struggle when the FAA is unable to provide timely oversight or to exercise its regulatory authority effectively or efficiently. Today, our industry is being stymied by delays in the processing of aircraft registrations, the issuance of pilot and mechanic certificates at all levels, and the timely completion of aircraft certification programs. In many cases, it is not just the delay, but the uncertainty of not knowing how long the delay will be.

For individuals preparing for practical tests, the delay adds cost to already expensive training programs. Additional training including instructor and equipment costs to maintain proficiency and, in some cases, needed travel expenses, adds stress and hassle to an already challenging situation. Companies developing new aircraft or components and undergoing certification, or those that rely on their aircraft and are awaiting approval of new equipment installations, are in the position of not knowing when they may be granted their approvals. From a business perspective, the uncertainty of not having a timeline is worse than having a very long timeline.

To be successful, industry must be able to rely on a consistent regulatory structure and timelines. These delays are the result of a combination of dated programs, lack of staffing, and a shortage of qualified individuals in many critical FAA offices. These delays are compounded by a lack of agency-wide reporting of key performance indicators that provide important statistics on the status, efficiency, and effectiveness of the FAA's oversight of the industry.

Designated Pilot Examiners

To address the issues in pilot certification, the agency should expand its use of the Designated Pilot Examiners by moving oversight from the local to national level to further leverage the resources and knowledge of the General Aviation industry. The aviation industry is currently facing a significant shortage of Designated Pilot Examiners (DPE) nationwide, with some Examiners maintaining a wait time of 4-6 weeks to schedule a practical test to issue a pilot certificate. The problem appears to be rooted in the systematic oversight of Examiners through the FAA Flight Standards District Office (FSDO) network.

The FAA should implement the recommendations of the Designated Pilot Examiner Reforms Working Group (DPERWG) as established by the Aviation Rulemaking Advisory Committee (ARAC) which includes the implementation of a national oversight program for all Examiners. Nationalizing Examiner oversight, moving oversight to the FAA Headquarters level, will address the issue of Examiner shortage by removing the requirement for an appropriately qualified Aviation Safety Inspector at each office. This program will also focus the FAA's resources ensuring Examiner deployment is adequately resourced and will standardize the selection process making for a more transparent national system.

Modernization of Special Airworthiness Certificates

EAA works closely with a number of FAA offices on the development and ongoing improvement of programs important to the growth and health of general aviation. One effort currently underway that presents a significant opportunity to grow the general aviation industry is the Modernization of Special Airworthiness Certificates (MOSAIC) rulemaking. MOSAIC is the expansion of the current Light Sport Aircraft (LSA) standards. LSA is a current class of aircraft whose size and weight restrictions limits their usefulness as training aircraft and their commercial viability in the market. MOSAIC, as envisioned and when implemented, has the potential to demonstrate how an Agency can effectively expand a regulatory structure to support growth while maintaining safety.

Thanks to action taken by current FAA leadership, the MOSAIC Notice of Proposed Rulemaking (NPRM) is now expected in summer of 2023. We feel Congress should ensure this critical rulemaking continues to have the support it needs by directing the FAA to publish, by the end of calendar year 2024, a final rule that expands the utilization of light-sport aircraft, promotes their use in flight training and does so in a manner that ensures U.S. manufacturers are not at a disadvantage to foreign manufacturers.

Future Fuel for General Aviation

EAA remains firm in our support of efforts to remove lead from aviation gasoline, and it is our position that any transition from leaded to unleaded gasoline must be effectuated with safety as the highest priority.

In an exhaustive 2021 report to the FAA on options for reducing aviation lead emissions, the National Academies of Sciences, Engineering, and Medicine recommended that the "FAA should continue to collaborate with the [general aviation] industry, aircraft users, airports, and fuel suppliers in the search for and deployment of an acceptable and universally usable unleaded replacement fuel," urging a "holistic

process” to develop and deploy such a fuel. Only through a government-industry effort that would involve the private sector, the FAA, and Congress could the aviation system eliminate lead emissions.

We agree with that conclusion, and accordingly the FAA, general aviation associations, and other aviation stakeholders have launched a public-private initiative titled “General Aviation Commitment to Eliminate Aviation Gasoline Lead Emissions,” or “EAGLE,” which intends to achieve its firm goal—elimination of lead emissions from general aviation aircraft by the end of 2030, or sooner if possible — through development and deployment of a viable high-octane unleaded replacement aviation gasoline that can be safely operated by the U.S. fleet with minimum impact.

The next 12 to 18 months will provide our industry with a better understanding of our unleaded future. Four high-octane unleaded fuels are currently in evaluation and/or deployment phases to determine whether they are a viable replacements for our current fuel. In September of 2022, the FAA approved the first high octane unleaded fuel after many years of testing. The developers of this fuel, working with industry partners, are now focused on the production and distribution infrastructure needed to support the commercialization of this fuel. Another of the four fuels has indicated that they expect to receive their authorization from the FAA sometime this year. They will then also be exploring the production and distribution of their fuels. The two additional fuels are in various stages of testing with results and potential authorizations anticipated in 2024.

Vital to a successful and stable transition to an unleaded fuel is maintaining the availability of our current avgas during this period of development, authorization for use, commercialization, and deployment. The FAA plays a vital role in protecting the avgas supply throughout this process, particularly on federally funded airports. It is imperative that the FAA ensure the safe and coherent operation of the National Airspace System by protecting the continued supply of aviation gasoline with the timely and expedient enforcement of airport grant obligations. We cannot undermine the vitality and importance of the general aviation community while making progress toward an unleaded future.

Additionally, the EAGLE initiative is currently looking at areas for potential federal investment to facilitate this transition and we would like to work with Congress as these initiatives are developed.

Uncrewed Aircraft Systems (UAS or Drone) Integration

EAA remains committed to the philosophy that Uncrewed Aircraft Systems (UAS) should be integrated into the National Airspace System, while maintaining that the safety and sanctity of crewed aircraft must remain absolutely paramount. Any changes to existing airspace, procedures, or regulations that provide access to UAS cannot decrease the safety, encumber in any operation that is presently allowed, nor impose any equipment mandates on crewed aircraft beyond what is already required. EAA supports integration and recognizes the benefits of safely integrating UAS operations into the NAS. However, safety of crewed aircraft and the public must always be the first priority of integration.

We encourage Congress to ensure that the FAA continues to integrate UAS into the National Airspace System without burdening the general aviation community with cost or operating restrictions.

FAA Industry Engagement and Presence

With these challenges, we have seen a trend within the FAA to be hesitant to send staff to in-person industry meetings and events. At a time when the FAA is challenged to effectively administer programs, engagement and communication with industry should be increased, not decreased. We strongly encourage the FAA to continue to staff these important meetings to ensure that industry is kept abreast of the agency’s challenges. It is through these meetings and discussions that FAA and industry can develop

strategies to work together to find solutions and paths to most effectively utilize limited resources. Many of these events also allow the FAA to maximize travel expenditures by seeing numerous groups of the regulated community on the same trip, which otherwise would require multiple trips or would eliminate valuable face-to-face opportunities with the FAA.

Closing

We greatly appreciate the opportunity to appear before this committee and provide our views on the challenges and opportunities facing general aviation. Throughout our history, EAA has worked closely with the FAA to develop programs that enabled and expanded the scope of recreational aviation. We look forward to working with this Congress and the FAA to ensure that the United States remains the gold-standard in aviation and that general aviation continues as the vibrant foundation to that standard.