

March 27, 2023

Senator Brian Schatz
U.S. Senate
Washington, DC 20510-1102

Dear Senator Schatz:

On behalf of the organizations listed below, we write today to commend your efforts to enhance aviation safety. The Air Tour and Sport Parachuting Safety Improvement Act of 2023 takes a thoughtful and holistic approach to addressing safety that our associations support. Your collaboration with industry throughout the process is greatly appreciated, as we all share the same goal of promoting initiatives and policies that will make flying safer.

We share the legislation's promotion of safety management systems (SMS) as an effective way to address aviation safety. SMS is a modern, data-driven approach to maintaining safety that emphasizes hazard reporting, risk analysis and mitigation, and a continuous process of evaluation and adjustment to those mitigation strategies. Air tour operators conducting paying-passenger aviation activities should establish an SMS program within their operation.

We also support a provision in the bill to establish an Aviation Rulemaking Committee (ARC) with a mission to develop performance-based safety improvements for consideration of new avionics technology. New technology can play an important safety role in helicopter operations, and it is our hope the ARC recommendations will avoid a "one solution fits all" approach that can lead to safety concerns in some operations.

We appreciate the considerable work you have done to address our concerns regarding the transition of commercial air tour operations from Part 91 to Part 135. To achieve the intent of your legislation, the FAA must enhance its ability to conduct various oversight activities, including inspections, check rides, testing, and certification approvals and we appreciate your leadership of the Senate Transportation, Housing and Urban Development, and Related Agencies Appropriations Subcommittee in this regard. We look forward to working with you to ensure FAA has the adequate resources and support for a successful

transition process without hindering the Agency's timely certification and oversight of current 135 operators.

We understand the focus of the bill is on commercial air tour operators and thank you for your commitment and continued engagement to ensure other aviation activities are not inadvertently included. We look forward to working together to help ensure this legislation moves forward.

Sincerely,

General Aviation Manufacturers Association
Helicopter Association International
National Air Transportation Association
National Business Aviation Association