February 15, 2011

Docket Operations, M-30
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Subject: Docket No. FAA-2010-1127-0001 Photo Requirements for Pilot Certificates

The National Association of Flight Instructors (NAFI) appreciates the opportunity to represent our membership and take part in the rulemaking process, with the end goal of improving security in aviation operations.

In response to the Notice of Proposed Rulemaking issued November 19, 2010, entitled Photo ID Requirements for Pilot Certificates, NAFI respectfully submits the following remarks.

I. Introduction to NAFI

The National Association of Flight Instructors (NAFI) is an international organization dedicated to raising and maintaining the professional standing of flight instructors. NAFI is the largest flight instructor association with over 5,000 active members and unique and specific represents the interests of the over 90,000 flight instructors in the United States. NAFI has served as the voice of aviation education since inception in 1967 and serves the full spectrum of the flight instructor community. Now, more than ever before, we are moving to enhance this original commitment.

The association’s efforts focus on the needs of its members. While members benefit in different ways from NAFI membership, the most important reason for being a part of NAFI is supporting the flight instructor’s responsibility to all of aviation and commitment to professionalism.

II. The Position of the National Association of Flight Instructors

NAFI understands and appreciates the ever-changing nature of threats to security and the need to mitigate and manage such risks in aviation, not simply the flight training industry. Therefore, NAFI fully supports a proposal to enhance pilot certificates which conforms to Public Law 108-458, the Intelligence Reform and Terrorism Prevention Act (IRTPA) of 2004. NAFI further supports and recognizes the FAA’s prerogative to make “modifications to the airman certification system to make the system more efficient in serving the needs of those enforcing laws related to combating acts of terrorism by
ensuring verifiable identification of individuals applying for airman certificate,”¹ and that the provisions of this NPRM represent the first positive attempts at additional security measures in the future.

III. Concerns

NAFI believes the spirit of the IRTPA was a good faith effort to enhance and modify the multifaceted security concerns in the United States. Unfortunately, the sections of the act specifically cited in the NPRM as the basis for compliance, namely section 4022, have yet to be executed according to the deadlines set forth by the act. The IRTPA was signed into law December 17, 2004. According to the aforementioned section, the act tasked the FAA with implementing the initial issuance of new pilot certificates that “are resistant to tampering, alteration, or counterfeiting; include a photograph of the individual to whom the certificate is issued; and are capable of accommodating a digital photograph, a biometric identifier, or any other unique identifier”² to all certificated airman within one year after its passage.

NAFI’s support of security enhancements to the airman certificate does not indicate that NAFI is without some questions relating to the implementation of the effort. NAFI understands that the apparently expedited nature of this NPRM may be due, in part, to congressional pressure.³ Nevertheless, while NAFI supports the FAA’s efforts to meet the requirements of the public law and the demands of the legislature, there are specific proposals contained within the NPRM which NAFI is compelled to address on behalf of the membership.

One of the primary concerns that NAFI has with this notice is that it does not appear to meet the requirements of the IRTPA to include a biometric identifier on the new photo ID airman’s certificate. The notice does acknowledge this mandate and cites the law in its “background” section, but no further mention of accommodation for a biometric identifier is present in the rest of the document. Representative John Mica recently recognized the current state of non-compliance in a letter to the FAA, TSA, and the Department of Homeland Security, expressing his distress over the missed deadline for implementation. Most importantly, though, a spokesman for Congressman Mica confirmed that the legislature would be decidedly unsatisfied with any final rule which did not contain provisions for a biometric identifier.⁴

Though the FAA is allowed some latitude by the Regulatory Flexibility Act, NAFI believes that it is important to “get it right the first time,” and concurrently find a cost effective solution which imposes a minimum financial burden on airmen. NAFI is not able, without context, to speculate whether or not the biometrics requirements were omitted in an effort to curb costs to airmen. If the biometric identifier provision is not addressed in the final rule, the new certificates will not be in compliance with IRTPA

¹ Docket No. FAA-2010-1127; Notice No. 2010-16 (“NPRM”)
² IRTPA Sec 4022. Note: for the rest of this response, the term “biometric identifier” will shall mean any of the requirements of IRTPA Sec 4022 (b)(3).
⁴ Ibid.
requirements. While a timely response to this mandate is necessary, to avoid future rulemaking and additional cost to the FAA and airmen, NAFI strongly recommends that any final rule must meet all prescribed requirements of Public Law 108-458.

**Effect on Student Pilots**

The nature of this legislation will have an effect on the training provision by flight instructors who NAFI represents. Based on this vested interest and the knowledge of potential effects, NAFI regularly provides input on legislation and/or rulemaking which pertains to the flight training industry. With respect to this proposal, NAFI is first concerned about the ramifications of this NPRM upon student pilots. The NPRM specifically identifies student pilots as a community included in the requirement for a Photo ID. The reason that student pilots are provided such a specific emphasis is because of a significant shift in protocol suggested by this NPRM. The implication that a student pilot would be required to have a photo based pilot certificate prior to solo flight, which according to the NPRM is estimated to take at least 6-8 weeks, would represent a barrier of timing in flight training. An additional barrier or cost would be present, requiring an additional step in the process, the requirement of a medical certificate and a student pilot certificate, two items at are currently done by one individual, which would now require two separate certifying individuals to complete. Though the NPRM’s analysis determines that it would “not have a significant economic impact…,” NAFI disagrees with this statement.

The first solo flight is a significant moment in the training process as the first time in a student’s training when they are acting as the Pilot in Command of the aircraft. While in theory it is possible for a student to receive dual instruction without possessing a student pilot certificate in the period prior to the first solo flight, this practice does not represent the industry norm. Student pilots generally obtain a certificate prior to beginning flight training.

A problem is expected related to the turnaround time between application and certificate issuance as estimated by this NPRM. In an economic climate where flight training is continuously becoming more expensive, one way students often reduce costs of flight training is to increase the frequency of their training. This prevents the degradation of valuable skills and knowledge, and will save the student money otherwise wasted on reviewing previously taught content. It is no stretch of the imagination nor any extraordinary circumstance that an individual dedicated to their flight training could well have completed ground school, passed the required pre-solo test(s), received dual instruction, and be ready to solo well inside of the 6 to 8 week window estimated by the FAA. There exists the potential for indirect costs to student pilots who must wait until they are issued a student pilot certificate in order to solo, but require remedial training once the certificate is issued due to delays. NAFI views this delay in the issuance of student pilot certificates as strong potential hindrance, economically and educationally, to both student pilots and flight schools.

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5 Miller, ND. “Guaranteed best way to cut the cost of flight training.” http://www.bobmillerflighttraining.com
Effect on Flight Training Industry

Very often, prospective students undergo an airman medical examination and subsequently obtain a student pilot certificate on a speculative basis prior to committing to a flight training program. This benefits not only the individuals, but also the flight training industry. It allows students to determine if they are medically fit to fly, and flight schools to administer introductory flights and the first few hours of instruction to gauge the individual’s level of interest and aptitude. This analysis is quantified by supporting data from derived from the FAA website, which indicates that since 2000, the issuance of student pilot licenses steadily increased while the certification of private pilots from 1999 to 2009 precipitously declined. 

There exists a larger percentage of individuals who demonstrate a legitimate interest in flight training yet fail to become certificated airmen. Again, NAFI is not able to speculate on the specific reasons for attrition, but finds the 70-80% rate of attrition of student pilots extremely disconcerting. A poorly constructed application or certification process to meet photo or biometric identification standards could potentially increase this attrition rate or even serve as a barrier to initial entry to the profession and/or hobby.

Economic Impact

The economic impact upon the flight training industry beyond initial certification must not be understated. Students pursuing a career as a professional pilot would theoretically need to be re-issued a pilot certificate on, at the very least, six separate occasions (e.g., Student Pilot Certificate, Private Pilot Certificate, Instrument Rating, Commercial Multi Engine, Commercial Single Engine, ATP). The CFI and CFII certificates are not necessarily addressed, but if included would add additional instances. In many cases, these certificates may be followed by the next succeeding rating or certificate prior to even receiving the previous certificate based on processing times, resulting an applicant or pilot paying for a certificate that is superseded by a new one before even receiving the previous one. This represents a wasted and unwarranted cost.

NAFI must further recommend that a definite cost schedule be forthcoming prior to the issuance of the final rule. From a purely observational standpoint, NAFI posits that response from the aviation community has been overwhelmingly negative, but also largely speculative apparently due to incomplete analysis of the text of the NPRM. The text of the notice specifically references the original legislative vehicle for the FAA Reauthorization Act, HR 915, which was introduced last year in the 111th congress. HR 915 would have given the FAA authority to increase the proposed fee for issuance from a $22 maximum to $50. While HR 915 did not pass the 111th congress, it remains a priority in the 112th, with the language remaining largely the same as the original text of

6 See Appendix A for supporting data.
the bill. NAFI therefore does not believe that accurate direct cost-to-pilots estimates can be made given the history of delays\(^9\) in reauthorization legislation.

**Effectiveness for Security**

This NPRM is similar in structure to the Transport Workers Identification Credential (TWIC) which was mandated by the Transportation Security Administration for maritime workers and truck drivers. The TWIC has been a cause for complaint not because it does not conform to IRTPA, but because there currently exists little to no processes for identification verification, nor infrastructure such as card readers installed at security checkpoints. Traditionally, in practice, the airman certificate has not been used as a form of identification. Rarely are pilots asked to present their certificate as a credential, especially because most pilots operating at air carrier airports or in the air carrier environment also possess another photo ID issued by their employer or the airport which verifies they’ve received a background check and/or security training. While the cost estimates contained within the NPRM pertain only to the cost issuing the certificate itself, it does not address the potential economic impact upon both the government and private sectors for the installation of hardware compatible with an enhanced airman certificate, nor any new security processes designed to implement and augment the new certificates. If no designation of funds to verify use the newly proposed ID are additionally paired with this effort, then the overall implementation of the overall implementation is without utility and only represents a requirement to comply that will not be verified in the field.

**IV. NAFI Recommendations**

- NAFI Recommends allowance of non-photo temporary student pilot certificates.

  NAFI recommends that Student Pilot certificates be allowed to continue to be used for solo operation as currently, in accompaniment with a government issued photo identification. The strong oversight relationship that an instructor has with a training student further offers verification of students during their operational periods when they fly under solo conditions. The nature of a student pilot certificate requires a flight instructor to authorize each individual solo flight, offering additional opportunity for verification of identity that is not required once a pilot has been certificated and operates on their own.

  If the status quo for student pilot certificates is not a viable option, NAFI recommends allowing a short-term temporary paper certificate for student pilot privileges. The certificate should be issued by the pilot certificate application acceptance facility at the time the photo certificate is applied for and should have a 90 day expiration date. This will allow uninterrupted flight training while satisfying the requirement of having pilot photographic identification on file. Because of the supervised nature of flight training, NAFI does not foresee any additional security risk by allowing temporary paper certificates for student pilots.

that would be alleviated by requiring a photo certificate.

- NAFI recommends that the IRTPA-compliant pilot certificate be issued separate from an “operating privileges and limitations” certificate.

NAFI believes that the FAA’s cost analysis in the NPRM grossly underestimates the financial burden on professional pilots. The NPRM estimates the financial burden to be $19 per year, based on a renewal every 8 years. While this may be true for pilots flying for recreational purposes, professional pilots and flight students seeking a career in aviation have certificates reissued on a much more regular basis as they add operating privileges.

NAFI recommends having a pilot ID card that needs to be issued every 8 years in line with the Real ID Act. Operating privileges should be on a separate non-photo certificate which is only valid with the accompanying photo ID card, similar to the way an instructor certificate requires an accompanying pilot certificate. This non-photo certificate may look similar to the current pilot certificate and may be reissued as often as needed for changes in operating privileges while minimizing the financial and logistical burden on airmen, DPEs, and the FAA.

- NAFI recommends that flight instructor certificates are not considered “pilot certificates” for the purposes of the NPRM.

It is unclear if flight and ground instructor certificates are included under the provisions of the NPRM. While it is largely an issue of semantics, instructor certificates are neither included nor excluded in the proposal.

A flight instructor certificate already contains the limitation that it is only valid when accompanied by the associated pilot certificate. Requiring a photo instructor certificate is redundant and places an unnecessary financial burden on instructors who must renew their certificate every 24 calendar months. NAFI recommends leaving instructor certificates unchanged.

- NAFI recommends that a user friendly and manageable process for providing any photo for a certificate be established.

Specific recommendations are addressed later in this response.

V. NAFI direct responses to NPRM “Comments Invited.”

(1) While this proposal does not outline specific identity verification standards and processes, the FAA may include such standards and processes in a final rule. The FAA seeks comment on standards that should be used for identity verification to issue pilot photo certificates, either in person or remotely. Should the FAA require applicants to produce fraud-resistant documents to verify identity? If so, which documents or other identity verification procedures should the FAA implement to ensure a high level of confidence in the verification process?
In the process of identity verification, NAFI feels that the most logical solution is to follow the framework currently used by the Transportation Security Administration’s identity verification standards for the issuance of a Transportation Worker Identification Credential (TWIC) card (Appendix B). Because this protocol has been established and implemented in the application process for a similarly issued government photo ID, NAFI encourages the FAA to adopt this proven standard. NAFI believes that the documents and/or certificates which meet the aforementioned requirement constitute a reasonably fraud-resistant document with which identity verification can be made.

(2) Should the FAA consider an alternative implementation approach to the “trigger” and “non-trigger” approach set forth in the proposal? Should the FAA set one deadline, regardless of certificate level, for pilots to have a pilot certificate with photo to exercise the privileges of that certificate rather than implement the phased “non-trigger” approach set forth in this proposal? What is the basis and supporting data for a single deadline? If the FAA were to implement a single deadline, what time period for conversion to a pilot certificate with photo adequately balances the FAA’s need to comply with the statutory mandate and the burden on certificate holders? Would lengthening the implementation period significantly reduce burden on a pilot? What is the basis and supporting data for a longer time period?

NAFI agrees with a “trigger” event process for the first time issuance during the transition period to a photo certificate. Once issued, NAFI suggests that a more permanent photo ID be used as noted above in our comments. If an individual does not have a trigger event during the period of implementation, a deadline may be applicable.

NAFI supports a single deadline for “non-trigger” reissuance of pilot certificates. A precedence was previously set with the change to plastic pilot certificates from traditional paper certificates in the past. A single deadline simplifies the communication process and understanding for airmen, especially those who don’t have regular interactions with the flight training industry or FAA representatives.

NAFI proposes the deadline should be set at three years for all airmen. All active airmen will have a “trigger event” or a flight review prior to the three year deadline where the transition can be highlighted. This will ensure adequate and streamlined communication for the new certificate requirement through flight instructors, training centers, and/or DPEs.

NAFI does not support the phased “non-trigger” proposal. While we appreciate and respect the desire for minimal inconvenience to airmen, the phased approach is contrary to the security concerns that the IRTPA addresses. Many ATP-certified pilots operate in a SIDA environment and/or already possess company/airport photo identification. Making them the top priority for photo certificates does not further enhance security. Additionally, the phased system may lead to increased expense for publicity and undue confusion for airmen.
(3) Currently, the FAA envisions using Knowledge Testing Centers, DPEs, and FSDOs to accept pilot certificate applications and validate applicant identity. Are there alternative, potentially less burdensome, methods for pilots within the U.S. and outside of the U.S. the FAA should consider? In addition, what should the FAA consider when designating service providers with identity verification authority?

NAFI agrees that FSDOs should be provided the resources and training to be able to accept pilot certificate applications and validate applicant identity. Additionally, FSDOs should be provided the equipment to take digital photographs and upload the photograph to an appropriate FAA system for inclusion in a pilot certificate processing effort.

NAFI believes that the IACRA system should be modified to include an appropriately uploaded photograph as provided by the applicant that would meet standards to be established. A DPE could verify the picture based on review of a digital application and an in person review of corresponding documents to verify applicant identity. The ability for an applicant to upload their picture with an application has already been approved for use in the Alien Flight Student Program training approval process used by the TSA for training international students. This would add only one additional step to current guidance for DPEs, the verification that the photo uploaded with the applicant’s digital package along with the traditional verification of identity based on government issued photo identification.

An appropriate solution would additionally need to be addressed in the event that a paper application for certificate be required. A simple answer to this would be that if a paper application is required, that the applicant be required to submit a passport photo with the certificate application.

NAFI believes the additional policymaking and infrastructure required to utilize Knowledge Testing Centers as application acceptance facilities will lead to additional cost and startup delays to the program. Knowledge Testing Centers do not represent an appropriate solution at this time. Currently these centers do not have the resources to take and upload photographs to be used in this process or are provided access to airman records to effectively conduct the airman certification processing as required by this NPRM without significant changes to their infrastructure and access to airman records. This would require additional designation of ability and authorization to access the airman records by the FAA.
(4) Is the proposed 8-year duration for the photo, based on the photo duration for state driver’s licenses under the Real ID Act, a reasonable period of time that balances the security needs expressed in IRTPA and the burden on certificate holders? Are there other standards or guidance for photo accuracy the FAA should consider? What is the basis and supporting data for a shorter or longer duration?

NAFI agrees with the 8 year duration to keep alignment with the Real ID Act. Furthermore, upon application, the FAA or other such entities which have been delegated authority to accept applications must use identity verification data\(^{10}\) as currently used by the Transportation Security Administration for the issuance of the TWIC card (Appendix B). This would allow the FAA application process to conform to similar standards. A similar photo standard could be used for FAA application processes or the standards for a passport photo could alternatively be used.

(5) Is there any reason why student pilot certificates should not be treated like other pilot certificates for the purposes of meeting the IRTPA requirements? What is the basis and supporting data for your response?

In the opinion of NAFI, if student pilot certificates must conform to the IRTPA requirements without special provisions, the ensuing time needed to process applications and produce the certificates will present and undue hardship on the flight training industry. The supporting data comes directly from the NPRM itself, which predicts a protracted application and issuance process. Within such time, a student pilot could very conceivably be prepared to make the “first solo” flight, which would required a student pilot certificate. NAFI could find no credible data referencing the average time it takes a student pilot to solo, the association’s opinion remains that most reasonable instructors and entities within the flight training community would concur that a dedicated student could be ready well within the 6-8 week turnaround time. Furthermore, it is an industry accepted norm that the frequency of training flights has a direct impact on cost. Therefore NAFI believes that requiring student pilots to undergo the same process as certificated airmen would impose a financial burden in both direct and indirect costs which would adversely affect the flight training industry. NAFI recommends allowing temporary student pilot certificates as previously stated in this response.

(6) With respect to the photo that is placed on the pilot certificate, should the FAA accept only hard copy photos, only digitally-captured photos, or either hard copy or digitally-captured photos? What is the basis and supporting data for your response?

NAFI supports the FAA accepting digitally submitted photographs for electronic (IACRA) applications and hard copy photographs for paper (Form 8710) applications.

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Because the NPRM requires pilots to apply in person for identity verification, at the time of application for a certificate a DPE or FSDO could verify the picture provided with relation to additional government issued photo identification for identity verification.

An airman provided digital photo (potentially uploaded with an IACRA application) would have to meet set photo standards to be considered usable. Similar standards to the TSA’s TWIC or the State Department’s passport photo requirements could be applied.

(7) If the FAA accepts digitally-captured photos, what are the advantages and disadvantages of the following methods of acquiring the photo:

a) An applicant uploading a self-captured photo to the IACRA subsystem;

Applicant submitted photographs are most susceptible to potential tampering of photo content prior to upload. This disadvantage can be minimized by the requirement to review the photo in relation to the applicant’s identity when verifying identity in person for the certificating event. At that point, the FSDO or DPE could also have the option of uploading a new photo (if they had a method of capturing digital photograph present) or to decline processing of the certificate if they believe the photo provided does not meet established guidelines or that it is the person appearing for the certificate event.

An additional disadvantage could be that if the applicant does not provide a photo that appropriately meets photo guidelines, the application process may be delayed to such a time that the applicant can provide an updated photo or have a facility take such an appropriate photo.

The advantage to an applicant providing a self photo is that would allow for the applicant to require less travel or specialized service provision to provide the photo that would be used.

b) FSDO capturing the photo when the application is submitted;

The advantages of a FSDO taking a photo would include greater degree of consistency of meeting photo guidelines, ability to obtain an acceptable photo on the spot at the time of application, and staff that would be knowledgeable in the process.

The disadvantage could include travel to a FSDO for an Airman.

c) A Knowledge Testing Center capturing the photo when an application is submitted;

NAFI does not consider the use of a Knowledge Testing Center an appropriate option at this time.
d) A DPE capturing the photo when an application is submitted?

Advantages of a DPE capturing a photo when an application is submitted could include the ability to take or replace a photo on the spot at the time of application and/or replace an unacceptable applicant provided photo.

Disadvantages could include the need or the examiner to provide and travel with the equipment to take and upload photos, availability of a suitable background for the photo, lack of availability of photo editing software for appropriate cropping of images for size, and the training required for an examiner to provide appropriate photos. Additionally, in locations where internet access is not present, the use of an examiner providing a digital image would be negated.

On behalf of the members of the National Association of Flight Instructors, I would like to thank you for the opportunity to provide input and comment into these proposed rulemaking changes. I am certain that your work with the comments provided by NAFI and other organizations will result in improved safety and increased efficiency in the flight training areas these proposals affect.

Respectfully,

Jason E. Blair
Executive Director
## Appendix A

### Pilot Certificates Issued

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<td>100,555</td>
<td>93,861</td>
</tr>
<tr>
<td>Student</td>
<td>61,448</td>
<td>66,953</td>
<td>61,194</td>
<td>54,876</td>
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<tr>
<td>Recreational</td>
<td>41</td>
<td>48</td>
<td>39</td>
<td>48</td>
</tr>
<tr>
<td>Sport</td>
<td>784</td>
<td>1,147</td>
<td>628</td>
<td>684</td>
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<tr>
<td>Airplane - Private</td>
<td>20,217</td>
<td>20,299</td>
<td>19,052</td>
<td>19,893</td>
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<tr>
<td>Airplane - Commercial</td>
<td>8,687</td>
<td>9,318</td>
<td>10,595</td>
<td>11,350</td>
</tr>
<tr>
<td>Airplane - Airline Transport</td>
<td>4,748</td>
<td>5,918</td>
<td>5,204</td>
<td>3,113</td>
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<tr>
<td>Rotorcraft (only)</td>
<td>3,569</td>
<td>4,073</td>
<td>3,639</td>
<td>3,648</td>
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<td><strong>Flight Instructor Certificate</strong></td>
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<td>4,667</td>
<td>4,415</td>
<td>4,348</td>
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<tr>
<td><strong>Instrument Ratings</strong></td>
<td>9,559</td>
<td>10,318</td>
<td>11,480</td>
<td>12,403</td>
</tr>
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</table>

*Data in this appendix compiled by NAFI from multiple source pages on FAA.gov detailing pilot certification statistics.
Appendix B

TWIC Identity Verification Requirements for US Citizens

Required Documentation for U.S. Citizens – Transportation Worker Identification Credential (TWIC) Enrollment *As of August 31, 2010* U. S. Citizens (or U.S. Nationals) born inside the United States

If you are a citizen of the United States (or its outlying possessions) and you were born inside the United States (or its outlying possessions), you must provide one document from column A or two documents from column B. If you present two documents from column B, at least one of them must be a government-issued photo ID, such as a state-issued driver’s license, military ID card, or state identification card.

Note: U.S. Mariners who hold or intend to apply for U.S. Coast Guard issued-credentials should note that they may be required to provide the Coast Guard with copies of additional proof of nationality and/or citizenship. Information on this can be found at http://www.uscg.mil/nmc/ldcr_sips.asp, in the "General Information" package.

List A – one document

- Unexpired U. S. passport book or passport card
- Unexpired Merchant Mariner Document (MMD)
- Unexpired Free and Secure Trade (FAST) Card
- Unexpired NEXUS Card
- Unexpired Secure Electronic Network for Travelers Rapid Inspection (SENTRI) Card
- Unexpired United States Enhanced Driver’s License (EDL)
- Unexpired Enhanced Tribal Card (ETC)

List B – two documents (with one of the two being a government-issued photo ID)

- Unexpired driver’s license issued by a State or outlying possession of the United States
- Unexpired ID card issued by a State or outlying possession of the United States. Must include a State or State agency seal or logo (such as state port authority ID or State University ID)
- Original or certified copy of birth certificate issued by a State, county, municipal authority, or outlying possession of the United States bearing an official seal
- Voter’s registration card
- U. S. military ID card or U. S. retired military ID
• U. S. military dependent’s card

• Expired U. S. passport (within 12 months of expiration)

• Native American tribal document (with photo)

• U. S. social security card

• U. S. military discharge papers (DD-214)

• Department of Transportation (DOT) medical card

Required Documentation for U.S. Citizens – Transportation Worker Identification Credential (TWIC) Enrollment *As of August 31, 2010*

• U.S. civil marriage certificate

• Unexpired Merchant Mariner License (MML) bearing an official raised seal, or a certified copy

• Unexpired Department of Homeland Security (DHS) / Transportation Security Administration (TSA) Transportation Worker Identification Credential (TWIC) Card

• Unexpired Merchant Mariner Credential (MMC)

Required Documentation for U.S. Citizens – Transportation Worker Identification Credential (TWIC) Enrollment *As of August 31, 2010*
U. S. Citizens (or U.S. Nationals) born outside the United States
If you are a citizen of the United States (or its outlying possession) but you were born outside the United States (or its outlying possessions), you must provide one document from column A or two documents from column B. If you present two documents from column B, at least one of them must be a government-issued photo ID, such as driver’s license issued by a State or outlying possession of the United States, military ID card, or identification card issued by a State or outlying possession of the United States. One of the documents you provide must demonstrate that you are a citizen of the United States.

Note: U.S. Mariners who hold or intend to apply for U.S. Coast Guard issued-credentials should note that they may be required to provide the Coast Guard with copies of additional proof of nationality and/or citizenship. Information on this can be found at http://www.uscg.mil/nmc/ldcr_sips.asp, in the "General Information" package.

List A – one document

• Unexpired U. S. passport book or passport card – demonstrates U. S. citizenship

• Unexpired Merchant Mariner Document (MMD) – demonstrates U. S. citizenship if indicated on the MMD

• Unexpired Free and Secure Trade (FAST) Card – demonstrates U. S. citizenship

• Unexpired NEXUS Card – demonstrates U. S. citizenship

• Unexpired Secure Electronic Network for Travelers Rapid Inspection (SENTRI) Card – demonstrates U. S. citizenship

• Unexpired United States Enhanced Driver’s License (EDL) – demonstrates U. S. citizenship

• Unexpired Enhanced Tribal Card (ETC) – demonstrates U. S. citizenship

List B – two documents (with one of the two being a government-issued photo ID, and one must demonstrate U. S. citizenship).

• U. S. Certificate of Citizenship (N-560, 561) – demonstrates U. S. citizenship

• U. S. Certificate of Naturalization (N-550 or 570) – demonstrates U. S. citizenship

• U. S. Citizen Identification Card (I-197) – demonstrates U. S. citizenship

• Expired U. S. passport (within 12 months of expiration) – demonstrates U. S. citizenship

• Consular Report of Birth Abroad (FS-240) – demonstrates U. S. citizenship

• Certification of Report of Birth Abroad (DS-1350) – demonstrates U. S. citizenship

• Unexpired driver’s license issued by a State or outlying possession of the United States
Required Documentation for U.S. Citizens – Transportation Worker Identification Credential (TWIC) Enrollment *As of August 31, 2010*

- Unexpired ID card issued by a State or outlying possession of the United States. Must include a State or State agency seal or logo (such as state port authority ID or State University ID).

- Voter’s registration card

- U. S. military ID card or U. S. retired military ID

- U. S. military dependent’s card

- Native American tribal document (with photo)

- U. S. social security card

- U. S. military discharge papers (DD-214)

- Department of Transportation (DOT) medical card

- U.S. civil marriage certificate

- Unexpired Merchant Mariner License (MML) bearing an official raised seal, or a certified copy

- Unexpired Department of Homeland Security (DHS) / Transportation Security Administration (TSA) Transportation Worker Identification Credential (TWIC) Card

- Unexpired Merchant Mariner Credential (MMC)
Appendix C

The National Association of Flight Instructors included comments and discussion for a number of members in consideration of the issues and questions in this NPRM. The members of this committee include backgrounds in airline operations, flight instruction environments, simulator environments, and ground training environments. The wide variety of experience and knowledge of this committee allowed NAFI to consider the issues and questions from a variety of perspectives, all of which have relation to these questions. While the comments herein have been collectively agreed for submission by the members of the committee, they do not supersede or otherwise take the place of any individual comments the members of the committee may submit under separate response.

Brief biographical descriptions of the NAFI ANPRM Committee members are as follows:

**Jason Blair** – Executive Director of the National Association of Flight Instructors, an active CFI, NAFI Master Flight Instructor and FAA Designated Pilot Examiner, and the owner of a Fixed Based Operator that offers flight instruction, he also uses general aviation travel as his primary means of commuting to work. His FAA DPE activities include both part 61 and part 141 environment involvement.

**Brian Boardman** – Brian Boardman holds an ATP certificate with three type ratings, a CFI certificate with single engine, multiengine, and instrument airplane ratings, and an IGI certificate. He has provided flight instruction and conducted stage checks under FARs 61 and 141. He has also acted as a flight crewmember for corporate and charter operations under FARs 91, 135, and 121 Supplemental. He has served on initial certification teams for several Part 121, 125, and 135 operators and has extensive experience with ensuring regulatory compliance through air carrier manual systems.

**Jonathon Freye** – A commercial single- and multi-engine pilot with a Bachelor of Science degree from Western Michigan University’s College of Aviation and is a graduate of the Jet Equivalency Training program. He has also worked as a Certified Flight Instructor, has experience in Part 135 and Part 91 flight departments, and is certified as a CFII/AGI. Freye closely follows and engages with transportation regulations within the industry and at the Congressional level, and his policy analysis has been published in NAFI’s monthly publication and online. He serves as a Michigan Aeronautics Commissioner.

**Robert Meder** - Robert Meder is a CFI with single- and multi-engine and instrument privileges. Robert is the St. Louis FSDO 2009 CFI of the year, the Lincoln 2010 FSDO CFI of the year, and the 2010 Central Region CFI of the Year. He has been a check airman for a 141 operation, an active FAASTeam Lead Rep, He is active in volunteer activities at EAA AirVenture each year. Robert sits on the board of the National Association of Flight Instructors and is also an operating department manager with one of the largest railroads in the United States.
Harry Riggs – Mr. Riggs has extensive experience in handling aircraft litigation, on behalf of both plaintiffs and defendants and has litigated cases in numerous states, including Alaska. He specialized in aviation and products liability and represented several aviation insurance companies in defense matters. Mr. Riggs has represented numerous pilots, mechanics, and both corporate and airline flight departments in FAA enforcement related actions. In addition, he has represented Part 121 air carriers in regulatory and compliance matters plus several Part 135 operators.

He has held numerous offices in various aviation and legal associations and is past president of the National Transportation Safety Board Bar Association. He has lectured extensively on behalf of the Aircraft Owners and Pilots Association and the Experimental Aircraft Association and is currently Chairman of the EAA's Legal Advisory Council. In addition, Mr. Riggs is a former member of the NBAA’s Tax Committee and has lectured extensively on regulatory and enforcement issues affecting corporate and fractional aircraft owners and operators He was one of the original founders and developers of the AOPA three-day ground schools which were taught throughout the United States and Europe. He previously served as a pilot on a DC-3 owned and operated by the Prairie Aviation Museum of Bloomington, Illinois.

He is one of the original founders of NAFI and has been active in its operations since its inception. He currently serves on it’s Board of Directors. Harry holds an Airline Transport Rating and is type rated in a Cessna 500. He served as a flight instructor and course supervisor in the AOPA Flight Training Clinics held throughout the United States during the ’60s, ’70s and into the ‘80s. He was also one of the founders of the AOPA’s Private and Commercial Pilots Written Exam courses taught on weekends during that same period of time. In addition, he also holds instrument and ground instructor ratings. He has owned and operated a Piper Comanche 260, Beechcraft Travel Air and a Piper Aztec.