

EAA and WOA Comments to:

DRAFT – Program Guide for Oversight of Vintage, Surplus, & Exhibition Aircraft
Change 32 to FAA Order 8700.1, Chapters 15, 32, and 38

Program Guide for the Oversight of Vintage, Surplus, and Experimental Exhibition Aircraft.

1. EAA and WOA recommend the word “Surplus” be deleted from the title and elsewhere within this document. The oversight management of Vintage and Experimental Exhibition aircraft is different than the oversight management of Surplus aircraft. This document should not be mixing them.
2. Page 6 through 8: Under the “One AVS” concept, EAA recommends strongly that the list of *Program Management, Roles and Responsibilities* must include the Production/Airworthiness Certification Division (AIR-200) as one of the FAA’s multidisciplinary team members to achieve the program’s goals. While the AFS-300 division provides guidance for the maintenance and inspection of these aircraft, it is AIR-200 and their team at the Small Aircraft Directorate that have the responsibility for total airworthiness oversight of these aircraft, and, therefore, we recommend AIR-200 be included as a team member of this program.
3. Page 6: The *General Aviation and Commercial Division (AFS-800)* identifies the role of the National Program Specialist (NPS), but it does not identify AFS-800 as the National Program Office (NPO). It is our understanding the AFS-800 is the NPO, and a specialist within AFS-800 is the NPS.
4. Page 7: EAA believes the word “counsel” should be “council” in *The Specialty Aircraft Counsel* paragraph.
5. Page 8: FAA participants – add AIR-200, per the above discussion.
6. Page 8: Industry participants – we recommend adding the U.S. Army Heritage Museum, as an industry participant. They have the helicopter/rotorcraft expertise needed to make this program a success.
7. Page 8: We recommend the FAA consider adding a new section called - *Optional Government and/or Industry Participants*. This section should include, but not limited to:
 - a. NTSB (GA Office)
 - b. TSA (GA Office)
 - c. One representative from the existing cadre of National Designated Flight Engineer Examiner Registry (NDFEER).Both the NTSB and TSA have key roles in flight safety and security of these aircraft. Involving them in this program will create a total cross-functional team of expert stakeholders. Several large Vintage/Warbird aircraft retain the requirement to have a Flight Engineer; having an NDFEER on the team, as necessary, will improve standardization of the program.
8. Page 9: Top paragraph, delete the last sentence “It should be noted....” NDPERs are covered in depth in FAA Order 8700.1 and this sentence is not needed.
9. Page 9: Top paragraph, add a sentence describing the NDFEER role in this program. It is needed to show the complete program overview.

10. Page 9: Second paragraph, second sentence. This document needs to confirm the current and future roles of the FAA Great Lakes Region, the FAA Southwest Region, and other FAA regional assets in this program. If this is past history, delete the reference, as it is EAA's understanding that EAEs are appointed and managed by the NPO, not FAA Regions.
11. Page 10: Third paragraph – same as # 3, above. Is it “counsel” or “council”?
12. Page 10: “The examiner candidate must have...” Number 1 and 2 – does not address a rotorcraft only candidate who desires to become a helicopter examiner. An instrument - helicopter rating is required for these candidates, not an instrument-airplane rating.
13. Page 10: “The examiner candidate must have...” Only refers to airplane experience. No experience level listed allows for a helicopter candidate to apply. This list needs to be inclusive for all types of aircraft, including rotorcraft that fall under the guideline of this program, reciprocating and turbine engine powered.
14. Page 10: “The examiner candidate must have at least...” There remains an industry concern that the required number of hours exceeds the ability of candidates to obtain them based on the average number of hours that these aircraft fly per year. EAA and WOA feel this is especially critical when providing guidance to up-and-coming examiner candidates. The key is that flexibility is needed within the examiner qualifications.
 - a. A good example of this is the airplane requirement to have flown 300 hours within the past year. EAA and WOA understand that this requirement is word for word from FAA Order 8700.1, figure 15-2 and 15-4. If the examiner candidate meets all other requirements, but only flies experimental exhibition airplanes that operate 100 or fewer hours per year, then flexibility should be incorporated into this policy.
 - b. Rotorcraft and L-T-A DPE candidate requirements (Figure 15-3) are set at 100 PIC hours in “the past year”. EAA and WOA reason that this requirement was set at 100 hours for the same reason we are seeking this reduction – rotorcraft, L-T-A, surplus, vintage, and exhibition aircraft are all expensive to operate, fly less hours per year than other types of aircraft, there is a limited number of aircraft available to operate, and there is a very limited pool of qualified examiner candidates to meet the public need.
 - c. EAA and WOA recommend 100 hours be established as the annual minimum (“in past year”) PIC hour requirement to qualify as an examiner in vintage, surplus, and exhibition aircraft.
15. Page 11: Group Table. Missing Set I through Set X. To be a total program, we recommend this document include the table shown in Figure 32-1 of FAA Order 8700.1.
16. Page 11: Group I. Add OV-1 to the listing in this group.

17. Page 12: Fourth paragraph, change to read: “Finally, specialty examiners, like today’s NDPERs, NDFEERs, and EAEs, will not be restricted to geographical boundaries.” Don’t forget that NDFEERs are also specialty examiners. It is also noted that EAA and WOA understand these examiners are required to “notify” the geographically responsible FSDO when conducting an evaluation in there are vs. seeking “approval” from that FSDO for the evaluation flight. The difference in terminology is key to making the “will not be restricted to geographical boundaries” procedures succeed.
18. Page 14: Group II. Do turbine-powered vintage helicopters really need to be restricted to Group II? We recommend all exhibition helicopters be included in Group III.
19. Entire document: There is no process listed within this program that allows for deviations to be sought, nor provide direction as to whom would be responsible for approving/disapproving said deviation requests. This needs to be outlined.
20. Page 15: Next Steps. Add – Develop a National Vintage, Surplus, and Exhibition Aircraft Maintenance Registry Group comprised of A&P’s and A&P IA’s highly skilled in these types of aircraft. Called the NDMR (National Designated Mechanic Registry), this group will provide industry expertise to the NPS. Limit the group to ten (10) members, comprised of an expert from the different types of aircraft groups/sets, including helicopters.
21. This program should also define *Specialty Aircraft Examiner (SAE)*, as defined in FAA Order 8700.1, Chapter 15, paragraph 3B(9).
22. EAA and WOA recommend that this flight plan be geared toward a goal of having reasonable qualification requirements in order to meet industry demands for CFI’s, EAE’s, SAE’s, NDPER’s and NDFEER’s. Past programs have led to restricting the number of examiners for these aircraft.

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1. Chapter 15:
 - a. Page 15-3, paragraph 4. Paragraph A (*Region*) describes the duties and responsibilities of the NPO (paragraphs A(3)). This paragraph should be the first item under the lead paragraph, as the *Region* does not have oversight of the NPO. The existing paragraph A (*Region*) should then become paragraph B.
 - b. Page 15-4, paragraph 4F. This paragraph is missing the relationship of record keeping between the FSDO and the NPO. Does the NPO have any examiner record keeping responsibilities?
 - c. Page 15-5, paragraph 5. This paragraph does not reference Sport Pilot Examiners (SPE) or Sport Pilot Instructor Examiners (SPIE). They should be included to make the list all inclusive.
 - d. Page 15-11, paragraph 7D(1) *National Candidate Pool*. Recommend the first sentence end with the appropriate reference (FAR, Order, AC, etc.) for the appeal process.
 - e. Page 15-43 – EAA feels that figure 32-1 should be included in this Chapter as figure 15-13.

2. Chapter 32

- a. Page 32-1, paragraph 3B(3). Last sentence states "...or may be in the form of a letter of authorization." EAA could not find any information within this chapter defining when a letter of authorization is permitted vs. an entry on the airman certificate. Needs to be clarified.
- b. Page 32-4, paragraph 5A. This section does not outline the eligibility requirements to fly turbo-prop aircraft or turbine powered helicopters.
- c. Page 32-15, figure 32-1, Set X. The FAA needs to add examples of U.S. manufactured aircraft that could be registered as experimental; i.e., UH-1, AH-1, CH-54, CH-47, OH-6, YR-13, H-13, CH-46, etc.
- d. Page 32-7 and 32-15: Comparable aircraft. EAA feels the lists of comparable aircraft should include type-certificated aircraft that would provide sufficient duplication of flight characteristics that would qualify the pilot to safely operate the actual aircraft. EAA and WOA feel this is a vital industry concern. Pilot currency, proficiency, and overall flight safety would be greatly enhanced by allowing a pilot to obtain comparable experience in a type-certificated aircraft and its associated flight simulator. Obtaining comparable high performance procedural training and experience in an FAA-approved flight simulator is part of today's general and commercial aviation total flight training standardization program, as such EAA and WOA recommend it be incorporated into this program. A level 3 simulator should be considered as the minimum appropriate procedural trainer.

3. Chapter 38

- a. Page 38-2, paragraph 3(7), *National Program Office* (NPO). The NPO has oversight authority over more than just the EAE program, and the definition should reflect the programs the NPO oversees; i.e., NDPER, NDFEER, EAE, SAE, etc.
- b. Page 38-2, paragraph 3. Does a *Specialty Aircraft Examiner* (SAE) have the authority to conduct practical tests per this chapter? If so, the definition of a SAE needs to be added to this paragraph.

4. FAA Order 8700.1, Appendix 1, page Appendix 1-2. The acronyms NPO and NPS are not defined, but should be.

End of notes.....rsh/bf 8/28/2006

Bill Fischer
Executive Director, Warbirds of America

Randy Hansen
EAA Government Relations Director