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Re: Conversion to Organization Designation Authority and Increased Testing Fees

Recently, CATs and LaserGrade notified the general aviation industry and its testing centers of a pending fee increase of \$50 per knowledge test. Subsequent conversations have revealed that this fee is needed to cover costs of transitioning to the Organization Designation Authorization (ODA), as required by the Federal Aviation Administration (FAA).

The Aircraft Owners and Pilots Association (AOPA), the Experimental Aircraft Association (EAA), the National Air Transportation Association (NATA), and the National Association of Flight Instructors (NAFI) representing the combined interests of general aviation, aircraft owners and flight training providers, are concerned that this fee increase will further exacerbate the dilemma of the declining pilot population. Data has shown that for the first time in years, the pilot population will decrease below 600,000. In an effort to combat this decline, each organization continues to undertake programs and initiatives to grow the pilot population by increasing the number of those who start flight training. Our research indicates that 70% of those who begin flight training will not complete it, citing cost as the main reason. Once a person begins flight training, an important milestone to earning a pilot certificate is successful completion of the knowledge test. As the flight student reaches this milestone, the likelihood of completing his training is greatly increased.

With this in mind, we are asking that CATS and LaserGrade delay the April 1st implementation of the \$50 increase in testing fee as stated in the January 8th letter to AOPA. We also ask that the FAA, CATS and LaserGrade immediately begin a complete review of the process being implemented to transition to the ODA to determine if it is the appropriate vehicle for this program given the increase in costs. At a minimum, we ask that the FAA review each of the requirements and processes of the ODA to determine which can be streamlined or altered to lessen the impact on the community. We also ask that CATS and LaserGrade work closely with the FAA to review all industry processes being enacted to determine a method of minimizing the cost to test takers.

With minimum complexity and little cost, the current knowledge testing system has served the industry well. This increase in fees and added complexity will have no effect on the safety of the industry or the National Airspace System and only serve to erect another barrier to anyone interested in pursuing flight training.

The increase in fees begins to take the cost of the knowledge test into the realm of a practical test. A practical test for the issuance of a pilot certificate or rating includes an evaluation of an applicant's skill by a designated examiner and culminates in the issuance of a pilot certificate and the addition of piloting privileges. The knowledge test, on the other hand, is an automated process requiring no evaluation of skill by the testing provider, but simply the verification of the test taker's identity.

AOPA, EAA, NATA and NAFI are concerned that this increase in fees will serve no purpose other than continue to deter people from pursuing flight training. With this in mind, we ask that CATS and LaserGrade delay the implementation of the fee and that the FAA undergo a full review of the process being implemented to determine a more cost effective method.

Sincerely



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