

June 8, 2021

This document is in response to the Federal Aviation Administration's (FAA) request for additional information, pertaining to the public interest in approving a petition for exemption. The petition in question is seeking relief from aspects of 14 CFR 61.160.

This petition is for the benefit of two students who are enrolled at The Ohio State University, and are pursuing training to become professional airline pilots. Approving this exemption would allow both of these students to qualify for the Restricted Airline Transport Pilot (R-ATP) certificate, enabling them to enter the workforce more quickly in the face of an ever-growing pilot shortage, with no reduction in safety, proficiency, or capability.

Since March 2020, nearly every part of our society has been tested, and many accommodations have been made due to the Covid-19 pandemic. The FAA established Special Federal Aviation Regulations (SFARs) in order to allow pilots and others relief from certain regulatory requirements. These SFARs were issued for a variety of circumstances, and some pertained to training and currency requirements for pilots. While the requirements of 14 CFR 61.160 that this petition is seeking exemption from were not affected by the SFARs, the initial causation is the same.

These two students continued their flight training during a very challenging and difficult time, choosing to continue their training outside the University, and based upon the limited information they had at the time. In retrospect, it is clear that they should not have done so, as their continuation of flight training outside of the context of The Ohio State University's four-year program contravened the specifics of 14 CFR 61.160. However, their continued training also enabled them to further build flight hours, expand their proficiency and capability, remain current in the aircraft, and continue to pursue their career, in the midst of a global pandemic. This situation is therefore equally a testament to their individual commitment, pro-active and problem-solving nature, their understanding of the need to maintain flight proficiency for safety, and dedication to becoming productive professional pilots in the US workforce.

According to many reputable sources, airline pilots are forecasted to be in high demand for the foreseeable future. As an example, The Boeing Company, in their most recent annual report, forecasts that an anticipated 763,000 new pilots will

be needed globally over the next two decades. While that number shows the global need, the United States will account for a significant portion of those pilots. Even with that demand, the United States is not seeing a significant increase in the number of Airline Transport Pilots (ATP). The most recent report from the FAA shows that the estimated number of active pilots with an ATP has only increased 13% in the past decade, only 4% in the past five years, and actually decreased year-over-year from 2019 to 2020.

Given these statistics, the ability to meet the anticipated demand for airline pilots will be challenging. While this petition is being submitted for only two students, this petition is in the public interest because they can enter the workforce as fully trained and competent airline pilots in the near future. The career field is in high demand, the aviation industry is integral to the global economy, and the United States needs to do all it can to build a robust population of trained, certified, and safe professional pilots. By allowing this petition, the FAA will help enable a timely arrival of these students into the workforce, and allow them to fill critically needed positions quickly, helping to grow the US and global economy as we recover from Covid-19.

It will also allow the students to complete their training, to ensure that they perform to the skills required by the R-ATP, thereby protecting the public at-large. Unlike many of their cohorts during the Covid-19 pandemic, these students never had a break in their training, and remained at their peak performance the entire time with no degradation. Therefore, the public will be flying under the supervision and stewardship of two very capable, well trained, and safety focused professionals sooner than would otherwise be the case.

Additionally, this petition is asking for permission to allow the students to repeat portions of their training in order to retain eligibility for the R-ATP. This will serve to provide an even more fulsome training experience, further increasing their competence and level of safety in the aircraft. Requiring this training is in direct alignment with the core mission of the FAA to promote safety and protect the public.

The nature of the pandemic that has affected the world over the past eighteen months is a once in a hundred year event. Through the SFARs, the FAA has shown flexibility in some regulatory policies that were effected by Covid-19. We believe that this petition is similar in nature, and is justifiable due to the extenuating circumstances. The proposed remedy provides flexibility for the students involved, while also upholding the training requirements of the R-ATP. Through these standards, the FAA can show that the students will meet the professional training required as professionals in the field; and thus allow them a timely path to enter a workforce that is in critical demand both domestically and globally.



**Updated Contact Information:**

The original petition for exemption was submitted by Mr. Jim Free, on behalf of the students at The Ohio State University.

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Respectfully,

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