

RE: FAA Request for Comments on Modernization  
of Special Airworthiness Certification  
October 23, 2023



Filed electronically through the [Federal Register, Docket No. FAA-2023-1377](#).

Thank you for the opportunity to submit this comment regarding FAA's Request Comments on Modernization of Special Airworthiness Certification; Docket ID No. FAA-2023-1377. The Aviation-Impacted Communities Alliance (AICA) includes 70+ groups across the country dedicated to protecting communities from harmful levels of aviation noise and pollution through campaigns for legislation and industry change nationwide. Our comments:

- General aviation-impacted communities are concerned that the proposed MOSAIC rule "increases operating privileges" and that sport pilot will become the default certificate for flight training. It should not.
- The comment deadline was poorly timed. The review period overlapped with FAA's Noise Policy Review making it difficult for volunteer grassroots organizations to have adequate time to review the proposed rule and prepare a thorough comment.
- Noise impacts of the proposed MOSAIC rule are difficult to determine by general aviation impacted communities. Insufficient information is shared. High performance light sport aircraft are referenced and many current high-performance aircraft are alarmingly loud. Part 36 Noise Limits referenced in this comment document are difficult for communities to understand, let alone evaluate.

Respectfully submitted,

Darlene Yaplee and Cindy L. Christiansen, PhD, Aviation-Impacted Communities Alliance Co-founders