



February 8, 2025

## Notice of Public Meeting, and Request for Comment on the Modernization of Pilot Schools

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Thank you for the opportunity to submit this comment regarding the FAA’s Request for Comment on the Modernization of Pilot Schools (Docket ID: FAA-2024-2531). This comment is jointly authored and submitted by the Aviation-Impacted Communities Alliance (AICA), Save Our Skies Alliance, and Groton Ayer Buzz.

AICA represents over 90 groups nationwide, including Save Our Skies Alliance, and Groton Ayer Buzz, all of which actively advocate at both local and national levels for effective measures to reduce aviation noise and its health impacts on communities.

The modernization effort presents an opportunity to advance pilot training while ensuring all stakeholders—including impacted communities—are meaningfully considered. As stated in the Federal Register notice, the FAA has encouraged public input on innovative ideas, methods, and solutions that could significantly impact pilot school training, and we appreciate the opportunity to contribute. **Many of our recommendations align with ongoing industry-supported efforts to enhance training, safety, and community engagement. Strengthening these measures will further the FAA’s commitment to operational excellence while fostering transparency and accountability.** We urge the FAA to adopt these recommendations as it modernizes Part 141 to benefit both aviation and the communities it serves.

Firstly, we endorse the City of Phoenix Aviation Department’s comment (Comment ID FAA-2024-2531-0003)<sup>1</sup> which highlights the importance of improving communication with and recognition of impacted communities. Additionally, **we recommend key initiatives to strengthen the modernization efforts to reflect a holistic approach to safety, operational excellence, and community well-being:**

- 1. Incorporating Noise Abatement Training** – Enhance pilot education on noise-sensitive operations in accordance with Advisory Circular 91-36D to minimize community impact.
- 2. Optimizing Training Efficiency** – Continue work to reduce student dropout rates by improving resource allocation, streamlining training programs, and minimizing unnecessary environmental impacts.

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<sup>1</sup>City of Phoenix Aviation Department. *Public Comment on FAA National Airspace System Modernization Effort*. Comment ID FAA-2024-2531-0003, Federal Aviation Administration, 2024, <https://www.regulations.gov/comment/FAA-2024-2531-0003>

3. **Integrating Competency Assessments into Flight Hour Requirements** – Encourage the reevaluation of the 1500-hour rule through a competency-based framework that improves student outcomes and professional readiness.
4. **Increasing Transparency** – Consider requiring flight schools to publish graduation rates and safety track records, providing clearer insights into program effectiveness, helping students make informed decisions, and promoting accountability within the industry.
5. **Enhancing Flight Training with Historical Accident Analysis** – Further strengthen curriculum with most current data-driven insights and advanced technologies to improve pilot competency and overall flight safety.
6. **Leveraging Innovation** – Continue to advance modern technologies and training methods to enhance efficiency, improve pilot proficiency, and reduce community impacts from outdated systems.
7. **Ensuring Balanced Stakeholder Inclusion and Community Engagement** – Strengthen collaboration with impacted communities to enhance transparency, reduce conflicts, and create a more efficient, safe, and community-conscious training environment that benefits both pilots and the aviation industry.

We recognize that flight school training fulfills a fundamental role in preparing the next generation of pilots and influences the quality of life in communities across the country. As the FAA advances this initiative, we encourage a balanced approach that enhances pilot proficiency while promoting transparency, accountability, and thoughtful noise mitigation strategies. We appreciate the opportunity to contribute to this discussion and look forward to continued engagement in shaping a framework that benefits both the aviation industry and the communities it serves.

Respectfully submitted,

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CC:

Members of the Quiet Skies Caucus  
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## **RECOMMENDED INITIATIVES**

### **1. Incorporating Noise Abatement Training**

Advisory Circular 91-36D ("Visual Flight Rules (VFR) Flight Near Noise-Sensitive Areas") provides well-established FAA guidance, encouraging pilots to minimize noise impacts over sensitive areas such as residential neighborhoods, parks, and schools. It recommends flying at higher altitudes than the minimum permitted and avoiding overflights when possible. The principles behind "Fly Quiet" and Aircraft Owners and Pilots Association's (AOPA) promotion of "Fly Friendly" practices are closely aligned with this guidance, reinforcing operational best practices that help reduce aircraft noise exposure for affected communities.

Currently, AC 91-36D is not explicitly required in Part 141 pilot training curricula, though many pilot schools voluntarily include it to promote best practices in noise abatement and community-friendly flying.

While the FAA encourages pilots to minimize noise over sensitive areas, integrating this guidance into training programs would better align with those recommendations.

**We request the FAA AC 91-36D be incorporated into Part 141 training curricula, along with standardized noise abatement information in Chart Supplements.**

A key area for improvement is clearer and more consistent presentation of noise abatement details in existing publications, as inconsistencies and lack of standardization diminish their effectiveness and accessibility. Recognizing this issue, the FAA has been working across multiple departments to create a standardized, concise section in the Chart Supplement for noise abatement information. This initiative was highlighted by Beth White, FAA, at the ANE Symposium 2024 in her presentation, “Communicating Noise Abatement Information in the Chart Supplement.”<sup>2</sup>

To ensure pilots have consistent and accessible noise abatement guidance, FAA should require and support noise abatement procedures in a standardized format using plain language in the Chart Supplement for inclusion in pilot training curricula.

**Benefits**

- **Increased Pilot Awareness** – Supports pilots to have clear, accessible noise abatement procedures, improving voluntary participation.
- **Reduced Community Impacts** – Better communication of noise abatement strategies helps mitigate noise disruptions from both instrument and visual flight operations.
- **Enhanced Airport-Pilot Coordination** – Strengthens collaboration between airports and pilots, keeping noise abatement guidelines current and actionable.
- **Industry-Wide Standardization** – Promotes integration of essential noise abatement details across aviation stakeholders, benefiting commercial, general aviation, and business jet communities.

By communicating noise-sensitive flight operations and fostering collaboration among pilots, airports, and aviation stakeholders, these efforts advance responsible aviation policies that uphold the intent of AC 91-36D—balancing aviation needs with the protection of communities from excessive noise exposure.

Additionally, while the FAA often claims it does not formally designate flight training areas, its role suggests otherwise. As part of a Part 141 school application, the Flight Standards District Office (FSDO) requires a map outlining proposed training areas, effectively recognizing and validating them.

**2. Optimizing Training Efficiency**

Enhancing student pilot retention remains crucial for improving training efficiency and sustaining a strong aviation workforce. According to a study conducted by the Aircraft Owners and Pilots Association (AOPA), an estimated 70-80% of student pilots discontinue their training before getting a certificate<sup>3</sup>. The Redbird State of the Flight Training Survey 2024<sup>4</sup> data showed Flight Training Organizations (FTOs) had 36% waitlist and Designated Pilot Examiners (DPEs) had 48% waitlist in 2023. Long waitlists for FAA-approved DPEs exemplify inefficiencies in flight training programs, creating unnecessary delays for

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<sup>2</sup><https://anesymposium.agrc.ucdavis.edu/2024-program-information#NoiseAbatement>

<sup>3</sup>[https://download.aopa.org/epilot/2011/aopa\\_research-the\\_flight\\_training\\_experience.pdf?utm](https://download.aopa.org/epilot/2011/aopa_research-the_flight_training_experience.pdf?utm)

<sup>4</sup><https://offers.redbirdflight.com/state-of-flight-training>

student pilots. While efforts to expand the pool of independent DPEs continue, addressing systemic bottlenecks remains essential to streamlining the evaluation process.

**We recognize and support ongoing and future efforts to enhance training efficiency by reducing student dropout rates, optimizing resource allocation, streamlining programs, and minimizing unnecessary environmental impacts—critical steps toward strengthening the aviation training system.**

Communities near training areas are among those impacted by these inefficiencies, making it essential to optimize training resources to reduce unnecessary environmental and community effects. Repetitive, low-altitude maneuvers create excessive noise and carbon emissions, and lead emissions from aviation fuel pose serious health risks. Recent FAA data shows that 69,503 student pilots trained for their Private Pilot License (PPL) in 2023, a 24% increase from 2022.<sup>5</sup> With an average of 75 flight hours per student, this translates to 5.2 million flight hours. However, with an 80% dropout rate, over 4.1 million hours are wasted on students who never complete their training—resulting in financial losses, environmental harm, health impacts, and community disruption without producing new pilots.

Reports from Earthjustice<sup>6</sup> and Quartz<sup>7</sup> highlight that many of the nation’s top lead-polluting airports are those with high flight training activity, disproportionately affecting schools, parks, and residential neighborhoods. Reducing the dropout rate not only improves pilot training efficiency but also helps minimize environmental and public health impacts on communities, supporting a more sustainable and responsible aviation sector.

### 3. Integrating Competency Assessments into Flight Hour Requirements

As increasingly acknowledged, integrating competency assessments alongside flight hour requirements can modernize pilot training and better align it with the evolving demands of today’s aviation industry. A competency-based approach—focusing on critical thinking, decision-making, and practical skills—offers a valuable complement to traditional flight hours in measuring a pilot’s readiness. By incorporating structured proficiency evaluations, this approach supports enhanced safety, efficiency, and preparedness for the complexities of modern aviation.

In an article for *AVweb*, Russ Niles described Doug Stewart, a Flight Instructor Hall of Fame inductee, and his assessment of the current state of flight training<sup>8</sup>.

“What I didn't expect was Stewart's bone-chilling assessment of the state of flight training and the terrible prognosis for the professionalism of the industry. In a nutshell, the 1500-hour rule has resulted in a generation of ATPs [Airline Transport Professionals] who have only the vaguest idea how to fly any airplane, much less a 100,000-pound jet.”

Niles went on to summarize Stewart’s concerns:

“After decades as an instructor, he says he's never seen such unmotivated, unskilled and generally clueless students on their way to the airlines. There are some exceptions, for sure, but in general the vaunted ramp-up of flight training might as well be pumping air into the right seats of the nation and it has him terrified.”

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<sup>5</sup><https://www.flyingmag.com/faa-data-shows-student-pilot-numbers-on-the-rise/>

<sup>6</sup>[https://earthjustice.org/wp-content/uploads/top100leadpollutingairports\\_2021-08-23.pdf](https://earthjustice.org/wp-content/uploads/top100leadpollutingairports_2021-08-23.pdf)

<sup>7</sup><https://qz.com/2158594/do-you-live-near-enough-to-a-small-airport-to-have-lead-exposure#interactive-maps>

<sup>8</sup><https://www.avweb.com/insider/when-1500-hours-equals-10/>

According to Niles, Stewart faults a regulatory change following a fatal crash:

“He puts the blame squarely on the 1500-hour rule that was ordered by Congress after an accident in Buffalo, New York, that killed everyone on a Colgan Air Dash-8 Q400. The new law was supposed to have ensured that anyone with an ATP has the experience under his or her belt to competently fly big iron. In fact, it has led to a situation where one of those 1500-hour wonders can reach that all-important milestone with only 10 hours of solo flight time.”

As stated in the National Transportation Safety Board (NTSB) report on the Colgan Air Flight 3407 accident, the captain had accumulated approximately 3,379 total flight hours at the time of the crash.<sup>9</sup> This total includes experience across various aircraft types and roles. While his flight hours exceeded the later-established 1500-hour requirement, the NTSB identified deficiencies in his training and proficiency, particularly in handling the Q400 aircraft. This underscores the importance accumulating flight hours and ensuring comprehensive and effective training to develop the necessary competencies for safe flight operations.

While the 1500-hour rule was established with safety in mind, its emphasis on flight hours may place more focus on quantity than quality in pilot training. In some cases, the pathways used to accumulate hours offer limited operational complexity, which may not always provide the best opportunities to develop the critical decision-making skills essential for airline operations.

To further enhance safety and better prepare pilots for the complexities of modern aviation, **we encourage ongoing and future efforts to integrate competency-based assessments alongside flight hour requirements as part of the continued modernization of the 1500-hour rule.** By emphasizing skill mastery in addition to flight hours, this balanced approach would support student success, strengthen professional readiness, and reinforce safety as the FAA’s top priority.

Lastly, incorporating competency-based assessments could help ensure that flight training remains focused on comprehensive skill development versus prioritizing the number of training hours. *AVweb* has highlighted how the 1500-hour rule has given rise to “massively profitable flight-training centers that are openly described as ‘puppy mills.’”<sup>10</sup>

#### 4. Increasing Transparency

Aspiring pilots invest significant time and money in their training, yet they often have limited access to data that could help them assess the effectiveness and safety records of different flight schools. Unlike traditional colleges and universities, which report graduation rates, flight schools are not held to the same transparency standards.

**We encourage flight schools to publish graduation rates and safety records from the past 10 years, providing students with clearer insights into program effectiveness, supporting informed decision-making, and promoting accountability within the industry.** Making this information easily accessible on school websites—including details on completion rates for specific training programs and certification pathways—would be a meaningful step toward enhancing pilot education and training outcomes.

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<sup>9</sup><https://www.nts.gov/investigations/accidentreports/reports/aar1001.pdf?utm>

<sup>10</sup><https://www.avweb.com/insider/when-1500-hours-equals-10/>

## Benefits

- **Informed Decision-Making for Students** – Prospective students who commit significant time and financial resources to pilot training would benefit from clearer insights into their likelihood of program completion. Publicly available graduation rates and safety records would help aspiring pilots compare schools, assess program effectiveness, and make more informed choices about where to enroll.
- **Accountability and Quality Assurance** – Reporting flight schools’ graduation rates and safety records could motivate them to improve student outcomes, address barriers to completion, and enhance instructional quality. This transparency could contribute to industry-wide best practices and support schools in upholding their commitments to students.
- **Standardized Consumer Protection** – Just as colleges and universities report retention and graduation rates under federal guidelines, flight schools should be held to similar standards. This would help prevent misleading advertising and ensure that students are aware of their chances of successfully completing their training.
- **Workforce Development and Policy Planning** – Accurate data on graduation rates and safety records would provide valuable insights for policymakers, industry leaders, and workforce planners. This information could be used to better understand pilot training pipeline efficiency, identify gaps in aviation education, safety, and develop strategies to address any shortcomings.

## Implementation Considerations

- **Reporting Standards** – The FAA would play a key role in establishing guidelines for reporting annual graduation rates and safety records, ensuring consistency across flight schools.
- **Transparency Requirements** – Flight schools would need to publish their annual graduation rates prominently on their websites to support informed decision-making.
- **Data Verification** – Schools would be expected to submit annual reports to the oversight agency to verify the accuracy of published rates and maintain accountability.

By publishing flight schools’ graduation rates—aligning with broader educational transparency standards set for colleges and universities—along with safety records from the past 10 years, the U.S. would enhance accountability across the aviation sector. This would ultimately benefit students who rely on their successful training completion, the industry, and workforce development initiatives.

## 5. Enhancing Flight Training with Historical Accident Analysis

According to Walach (2023), general aviation has faced ongoing challenges in improving its safety record, with progress in reducing incidents and fatalities remaining limited. Walach notes that ‘loss of control in flight is still the number one cause for general aviation accidents’ (NTSB, 2014, 2015, 2016, 2017, 2018).”<sup>11</sup>

Further illustrating these risks, research from the AOPA Air Safety Institute (2014) found that 80% of solo student accidents occurred during takeoff, landing, and go-arounds—critical phases of flight that

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<sup>11</sup>Walach, M. F. (2023). Safety in Flight Training - An Analysis of the NTSB Data 2014-2018. *Journal of Aviation/Aerospace Education & Research*, 32 (3). DOI: <https://doi.org/10.58940/2329-258X.1954>

require strong training.<sup>12</sup> These maneuvers also affect communities near training patterns, highlighting opportunities to further enhance safety measures.

Kalagher et al. (2021) found that general aviation accidents resulting from a loss of situational awareness (SA) were fatal 59.6% of the time, emphasizing the need for training programs that improve pilot decision-making and spatial awareness.<sup>13</sup> Boyd and Dittmer (2016) focused exclusively on student solo flights, analyzing accidents from 1994 to 2013 in Cessna 172 aircraft, and found that training accidents accounted for 14% of all general aviation accidents.<sup>14</sup> Similarly, Ison (2014) identified strong correlations between pilot and situational factors in Visual Flight Rules (VFR) into instrument meteorological condition (IMC) accidents, finding that pilots in fatal crashes were 19 times more likely to have received a weather briefing and 10 times more likely to be in mountainous terrain—suggesting that pilots often entered deteriorating conditions despite available weather data. The study underscores the need for enhanced weather education and training on hazardous pilot attitudes.<sup>15</sup>

Flight safety is an ongoing priority that continues to evolve through proactive risk management and training technology advancements. Building on existing efforts, further strengthening the systematic identification of prevalent risk factors in both flight training and general aviation accidents can help enhance safety outcomes. While elements of risk-based training are already in place, increasing the focus on demonstrated competencies using new technology can further reduce real-world hazards.

To support this progress, **we encourage flight training programs to expand the integration of historical accident analysis, leveraging data-driven insights and advanced technologies to enhance pilot competency and overall safety.** A continued, collaborative effort to assess accident data and apply findings to a modernized, technology-enhanced training curriculum would provide additional benefits—not only for pilots but also for passengers, instructors, and communities connected to aviation operations.

**We encourage the FAA to consider requiring Safety Management Systems (SMS) for Part 141 flight training programs to further enhance safety and accountability in this critical area of aviation.**

## 6. Leveraging Innovation

The aviation industry has made significant strides in pilot training, with ongoing efforts to enhance efficiency, safety, and skill mastery. As training methods continue to evolve, there are opportunities to further modernize by expanding the use of technology-driven approaches that complement traditional

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<sup>12</sup><https://download.aopa.org/asf/InstructionalAccidentReportFINAL.pdf?utm>

<sup>13</sup>Kalagher, H., de Voogt, A., & Boulter, C. (2021). Situational awareness and general aviation accidents: An analysis of 94 US accident reports. *Aviation Psychology and Applied Human Factors*, 11(2), 112–117. <https://doi.org/10.1027/2192-0923/a000207>

<sup>14</sup>Boyd, D., & Dittmer, P. (2016). Accident rates, phase of operations, and injury severity for solo students in pursuit of private pilot certification (1994-2013). *Journal of Aviation Technology and Engineering*, 6(1), 44-52. <https://doi.org/10.7771/2159-6670.1139>

<sup>15</sup>Walach, M. F. (2023). Safety in Flight Training - An Analysis of the NTSB Data 2014-2018. *Journal of Aviation/Aerospace Education & Research*, 32 (3). DOI: <https://doi.org/10.58940/2329-258X.1954>

models and enhance learning and preparedness. A more balanced integration of real-world flight experience with advanced simulation and Virtual Reality (VR) could provide a scalable and effective path forward. Additionally, building on existing advancements, technology may further support early-stage assessments to help identify pilot candidates who need additional development, optimizing the use of valuable in-person resources such as Designated Pilot Examiners (DPEs). Based on data from the Redbird State of the Flight Training Survey 2024<sup>16</sup>, DPEs reported a decline in applicant preparedness compared to five years ago:

- 45% rated applicants as worse,
- 32% said they were the same,
- 18% found them much worse,
- Only 5% considered them better.

The same survey assessed the Perceived Value of Simulation for Private Pilot License (PPL) Training, reporting that from 2020 to 2023, pilots and students consistently rated simulation more favorably than Flight Training Organizations (FTOs), Certified Flight Instructors (CFIs), and DPEs.

Taken together, these findings underscore the importance of a modernized, competency-based training framework that leverages technology and simulation to improve pilot preparedness, optimize in-person training resources, and improve overall safety and efficiency.

It is widely recognized that simulators provide a controlled environment where pilots can safely practice high-risk scenarios, refine maneuvers to build muscle memory, and train without the constraints of aircraft availability or weather conditions. Leveraging advanced simulation technologies allows in-aircraft flight hours to be used more strategically focusing on complex skills and decision-making rather than repetitive basic maneuvers.

While simulators are already a well-established training tool, opportunities remain to further integrate them into flight training programs to supplement—and in some cases, reduce the reliance on—real-world flight hours. Expanding the role of simulation can help strengthen pilot proficiency, manage training costs, and enhance overall safety in the airspace.

Beyond skill development, increasing simulator-based training also supports broader sustainability and economic benefits, including reduced fuel consumption, lower emissions and noise pollution, minimized impacts on communities, and a more cost-effective approach to pilot education.

To maximize these advantages, **we encourage the FAA to expand simulator use in certification requirements, leveraging them as critical tools to assess trainee competency.** A balanced approach that shifts more training time to state-of-the-art simulation—while preserving essential in-aircraft flight experience—would modernize pilot training while upholding rigorous safety and competency standards. This approach ensures that pilot certification remains rigorous, affordable, and adaptable to the evolving demands of modern aviation.

The advantages of simulation in pilot training are widely acknowledged, and many flight schools and airlines have already begun adopting Virtual Reality (VR) and advanced simulation technology to further enhance learning. As these tools continue to evolve, expanding their use in training programs presents an opportunity to make flight training even more immersive, efficient, and cost-effective—allowing pilots to gain valuable experience in realistic environments before stepping into an actual aircraft.

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<sup>16</sup><https://offers.redbirdflight.com/state-of-flight-training>



*AINonline* reports, “More training device time equals better trainee performance and lower costs, and new VR trainers are making this happen.”<sup>17</sup> VR flight training offers a cost-effective complement to traditional methods, providing advantages such as reduced instructor fees, improved learning efficiency, and greater accessibility. However, the most effective approach remains a balanced integration of VR-based training with real-world flight experience to ensure comprehensive skill development. Several programs already exemplify the effectiveness of combining modern technology with in-aircraft flight training, demonstrating the potential for continued advancements in pilot education:

- **Embry-Riddle Aeronautical University’s Pre-Flight Immersion Laboratory for Operations Training (PILOT) Program**<sup>18</sup>
  - VR-based pre-flight training has been shown to reduce the time to a student’s first solo flight by more than 30%, leading to increased efficiency and better skill retention.
- **TRU Simulation’s VR-based Veris Flight Simulator**<sup>19</sup>
  - Provides pilots with structured, immersive training environments that accelerate skill acquisition. Certification activities with both the FAA and EASA are currently in process as of February 2024.
- **The U.S. Air Force’s Project FUSION**<sup>20</sup>
  - Integrates VR and mixed-reality training, enabling trainees to experience complex flight scenarios in a controlled, repeatable setting. This approach reduces reliance on expensive in-aircraft training while maintaining rigorous safety standards.

Recognizing the ongoing advancements in pilot training, **we support efforts to further modernize training programs by expanding allowable flight simulator credit hours for certification and deepening the integration of VR technology in collaboration with industry providers.** Building on current initiatives, these enhancements can further improve efficiency, skill development, and overall training effectiveness.

## **7. Ensuring Balanced Stakeholder Inclusion and Community Engagement:**

The previous 6 recommended initiatives, along with this proposal, help mitigate negative impacts on communities and enhance pilot training by promoting safer, more efficient, and competency-driven outcomes. A modernized approach that prioritizes both community and environmental considerations as well as industry needs will lead to a more balanced, responsible, and effective training system. Strengthening an open dialogue and collaboration among flight schools, regulatory agencies, airport operators, and impacted communities is essential to achieving these goals.

**We endorse the City of Phoenix Aviation Department’s comment (Comment ID FAA-2024-2531-0003)**<sup>21</sup> in its advocacy for “the identification of concepts and actions that improve the responsibility to,

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<sup>17</sup><https://www.ainonline.com/aviation-news/business-aviation/2023-08-01/virtual-reality-and-cost-drive-new-generation-flight?utm>

<sup>18</sup><https://news.erau.edu/headlines/improved-pilot-training-program-yields-promising-results?utm>

<sup>19</sup><https://media.trusimulation.com/234832-tru-simulation-reveals-cutting-edge-veris-vr-flight-simulator-as-new-cost-effective-training-solution-for-pilots?utm>

<sup>20</sup><https://www.seymourjohnson.af.mil/News/Article-Display/Article/3568733/pilots-achieve-readiness-through-virtual-reality-training/>

<sup>21</sup>City of Phoenix Aviation Department. *Public Comment on FAA National Airspace System Modernization Effort*. Comment ID FAA-2024-2531-0003, Federal Aviation Administration, 2024, <https://www.regulations.gov/comment/FAA-2024-2531-0003>

communication with, and recognition of impacted communities.” Below are excerpts from their submitted comment:

Phoenix recommends that the modernization effort scope be expanded to include the identification of concepts and actions that improve the responsibility to, communication with, and recognition of impacted communities. These actions could include requirements for flight schools to:

- Conduct community engagement when operational characteristics are expected to change.
- Conduct ongoing engagement when communities express ongoing concerns.
- Collaborate with airport operators, FAA airport district offices and FAA flight standards district offices on community concerns.
- Publish operational data and training schedules for community knowledge and benefit.
- Work with FAA air traffic officials to seek efficiencies and balance between pilot school business and training objectives with airspace safety and community compatibility needs.
- Ensure flight school involvement in FAA and NATCA ATO PBN design work groups and airspace modernization efforts.

Additionally, Phoenix recommends National Flight Training Alliance (NFTA) and FAA AFS-810 work with airport operators that support major pilot training operations (like Phoenix) as well as the FAA’s Aviation Noise Ombudsman (and related FAA regional community engagement officials) and FAA FSDO representatives to understand historical community complaints and concerns with pilot training schools and specifically, engage those communities during this modernization effort so meaningful input from the public can be achieved and sustainable policy changes implemented.

Along with the City of Phoenix comment endorsement, **we request that community members have formal representation in decision-making forums, such as Roundtable memberships and Advisory Committees, alongside industry stakeholders to support balanced and equitable decision-making.**

By integrating community perspectives into the modernization effort, the FAA can create a more effective, transparent, and balanced regulatory framework that benefits both aviation stakeholders and impacted communities. A collaborative approach will lead to safer, more efficient pilot training while fostering public trust and long-term sustainability in aviation operations.