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Pilot Training

UNIVERSITIES, NATA ENDORSE COMMUNITY COMMENTS ON PILOT TRAINING NEEDS

Two major aviation associations – the University Aviation Association (UAA) and the National Air Transportation Association (NATA) – told FAA that they endorse comments submitted by the Aviation Impact Communities Alliance and the City of Phoenix Aviation Department on what needs to be done to modernize FAA’ pilot training regulations.

The UAA represents 116 collegiate aviation institutions and 74 industry partners across aviation education, including regional and major U.S. airlines, aircraft and flight simulation manufacturers, fixed-and-rotary-wing flight training providers, and other aviation trade associations.

NATA represents nearly 3,700 aviation businesses including on-demand air charter air carriers and fractional ownership companies, maintenance facilities, Fixed Base Operators (FBOs), flight training providers, air sponsors at general aviation airports, and others.

In joint comments submitted to FAA on March 18, the UAA and NATA asked the FAA to adopt the following six goals they seek to modernize pilot flight training:

1. Optimize Training Efficiency – Reduce regulatory and operational hurdles that unnecessarily impose inefficiencies in training curriculum and resource allocation.

Some 55% of all Flight Training Organizations and 83% of Designated Pilot Examiners reported being over capacity or very busy, the UAA and NATA told FAA.

“However, simple regulatory changes can increase the efficiency of Part 141 training operations with no impact to operational safety.”

2. Integrate Scenario and Competency Based Training – Adopt FAA Industry Training Standards (FITS) practices into 14 CFR Part 141 regulations such as Learner-Centered Instruction (LCI), Scenario-Based Training (SBT), and Competency-Based Training and Assessment (CBTA).

3. Leverage Innovation and Technology – Allow for the expanded use of Flight Simulation Training Devices (FSTDs) and adoption of Virtual/Augmented Reality Training (V/ART).

“Expanded use of FSTDs in pilot training offers a cost-effective, scalable solution that enhances safety and resource utilization. Simulators provide structured, high-fidelity training environments where pilots can refine skills, develop muscle memory, and safely practice high-risk scenarios without aircraft availability constraints,” the UAA and NATA wrote.

4. Enhance Flight Training with Evidence-Based, Data-Driven Insights – Incorporate practices from 14 CFR 121 and 135 aircraft operators, such as Safety Management System (SMS), Flight Data Monitoring (FDM) / Flight Operations Quality Assurance (FOQA), Aviation Safety Action Program (ASAP), Line Oriented Flight Training (LOFT), Crew Resource Management (CRM), Human Factors Analysis and Classification System (HFACS), and Upset Prevention and Recovery Training (UPRT).

5. Increase Transparency of Program Effectiveness – Require Part 141 pilot schools to report to the FAA student outcome, training effectiveness, and operational safety metrics for evaluating training trends and informing decision-making for prospective students.

“These metrics would allow for benchmarking across schools and identifying best practices that contribute to pilot success,” the UAA and NATA asserted. “Increased transparency would support more informed decision-making when selecting a flight school and incentivize training effectiveness of high achievement providers. Publicly available data would enable students to evaluate training programs based on measurable success factors rather than marketing claims. The FAA could use these insights to refine training standards, address systemic issues within flight training, and ensure pilot education aligns with real-world operational needs. Establishing a structured reporting system for Part 141 schools would foster a culture of accountability and continuous improvement, ultimately strengthening the pipeline of well-trained pilots entering commercial aviation.”

6. Incorporate Stakeholder Inclusion and Community Engagement – Strengthen collaboration with impacted communities to foster a community-conscious training environment that benefits both pilots and the aviation industry in accordance with Advisory Circular 91-36D.

UAA and NATA told FAA that they “recognize that flight training operations contribute to noise and environmental pollution. Many of our members have implemented voluntary initiatives to reduce noise and pollution emissions in collaboration with impacted community stakeholders. The practices include avoiding flight maneuvers above populated areas or operating well above minimum altitudes when these areas cannot be avoided. We support the use 94-octane unleaded fuel wherever possible, and the FAA EAGLE’s initiative, co-chaired by NATA, for transitioning to 100-octane unleaded fuel when commercially viable.

“UAA and NATA, along with Aviation-Impacted Communities Alliance (AICA), Save Our Skies Alliance, and Groton Ayer Buzz (Comment ID FAA-FAA-2024-2531-

0004), endorses the City of Phoenix Aviation Department's comment (Comment ID FAA-2024-2531-0003) in its advocacy for "the identification of concepts and actions that improve the responsibility to, communication with, and recognition of impacted communities."

Additionally, UAA and NATA endorse the following concepts from the aforementioned comments:

- Proactive engagement with impacted communities when training operations change;
- Collaboration with airport operators, FAA offices, and air traffic officials to balance safety, training efficiency, and community concerns; and
- Public transparency in training schedules and operational data to foster community trust.

The comments submitted by the City of Phoenix and the Aviation -Impacted Communities Alliance were reported in the Feb.1, 2025, issue of ANR.

April 24 is the deadline for submitting comments to FAA on its effort to modernize pilot training regulations. Comments can be submitted at www.regulations.gov (search for FAA-2024-2531). FAA explains at that docket:

The process of licensing or certification of pilot schools in the United States has been in existence for almost 100 years. Although the FAA has revised certain regulatory requirements pertaining to pilot schools during this time, the FAA's part 141 still has many foundational ties to Civil Air Regulations (CAR) part 50, which was implemented in the 1940s.