



August 1, 2012

Acting Administrator Michael Huerta
Orville Wright Building
FAA National Headquarters
800 Independence Ave., SW
Washington, DC 20591

Mr. Huerta,

Thank you and your leadership team for taking the time to meet with our organizations during AirVenture and in Washington, D.C. As you will recall, on both occasions we discussed the collaborative government and industry efforts necessary to facilitate the development and deployment of an unleaded avgas replacement for 100LL. We are at a critical phase between consideration of the Unleaded Avgas Transition Aviation Rulemaking Committee (UAT ARC) recommendations and implementation of a fiscally responsible Federal Aviation Administration (FAA) unleaded avgas program that will achieve this objective. Adequate funding of \$5.5 million for such an avgas program in the Fiscal Year 2014 budget is extremely important, not only for the economic sustainability of general aviation in the U.S., but for its safety.

The issue of identifying and deploying an unleaded avgas replacement with least impact on the current fleet of aircraft remains a significant concern for our industry. From a consumer standpoint, the lack of clarity - erodes confidence and negatively affects safety decisions. For example, repair and overhaul of engines and investment decisions such as avionics and nextgen equipment and replacement of aging aircraft with new ones are hindered due to ambiguity on the way forward. An avgas program is also needed to support FAA's statutory role in cooperation with EPA to implement any lead emissions standards for aircraft it deems necessary under the Clean Air Act.

We greatly appreciate FAA's leadership in establishing the UAT ARC and years of fundamental R&D activity in this area. The industry strongly believes that the establishment of an avgas program that goes beyond the previously planned R&D activities to include the key elements of the UAT ARC recommendations is critical. We respectfully request that these efforts be implemented through a comprehensive unleaded avgas program that includes centralized policies, procedures and testing activities necessary to support safety qualification of candidate fuels and fleet wide certification approval.

As discussed last week, the industry requests a total of \$5.5 million in FY14 funding. This is necessary to support a comprehensive unleaded avgas program which goes beyond the previous \$2 million R&D activity. Certification policy support from the technical experts at the Engine

and Propeller Directorate under the operations budget is essential to managing this program. This request is in support of the first year of a 5-year program which would accomplish the agency's Flight Plan goal of identifying an unleaded avgas replacement that meets the needs of the majority of the fleet by 2018.

We recognize that this total funding level is less than the UAT ARC recommendation and believe that it reflects a fiscally responsible program based on a reduced scope of activities to include the key elements that require direct FAA involvement. It also represents a refined assumption that only two candidate fuels shall progress through to full scale testing (referred to as "PAFI Medium"). However, we also recommend additional industry contributions through the use of technology transfer policy approaches, such as a Cooperative Research and Development Agreement (CRDA), to facilitate the ability for cost sharing from fuel sponsors who will be able to realize the commercial potential of these activities. This could also facilitate increased use of industry facilities and capabilities that are already in place for certain high cost activities such as flight test.

The work of the UAT ARC and implementation of its recommendations will facilitate the complex transition of the GA piston fleet to an unleaded fuel. Support by the FAA, and ultimately the Department of Transportation and the Administration, in the FY14 budget request will be essential to making certain that this transition is done in a way that effectively balances environmental improvement with aviation safety, technical challenges, and economic impact. Thank you for your time, consideration, and ultimately support of this objective that is critical to the general aviation community. We will continue to advocate for adequate funding throughout this program and look forward to working with you on this critical initiative.

Best regards,



Craig L. Fuller, President & CEO
Aircraft Owners and Pilots Association



Rod Hightower, President & CEO
Experimental Aircraft Association



Peter J. Bunce, President & CEO
General Aviation Manufacturers Association



James K. Coyne, President & CEO
National Air Transport Association



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