

January 4, 2018

Rich Sewell, Aviation Planner
Alaska Department of Transportation & Public Facilities
PO Box 196900
Anchorage, Alaska 99519
statewideaviation@alaska.gov



RE: NOTICE OF PROPOSED AIRCRAFT REGISTRATION REGULATIONS

Dear Mr Sewell:

The Alaska Airmen Association is a not-for-profit General Aviation (GA) organization that represents over 2000 members. Our mission is to "Promote General Aviation in Alaska." Membership includes pilots, mechanics, aircraft owners and other aviation enthusiasts. On behalf of our membership, thank you for the opportunity to submit the following written comments concerning the Alaska Department of Transportation & Public Facilities (DOT&PF) proposed Aircraft Registration Regulations.

As pilots, mechanics and aviation professionals we recognize and appreciate the importance of complying with Federal Aviation requirements. We also see the planning benefit in knowing what type and how many aircraft are based at any of the 240 airports DOT&PF sponsors. Also, as citizens, we understand the funding crisis facing our state. However;

The Alaska Airmen Association strongly opposes the establishment of this proposed Aircraft Registration Program.

Our members and the entire Alaska aviation community have been very vocal in our opposition to this proposal as it is written. The Governor's Aviation Advisory Board determined that DOT&PF needs collect data only on 10% of the aircraft in the state to comply with the FAA. A vast majority of our members do not base their aircraft at any of the state-sponsored airports required to report based aircraft data to the FAA. Some are based at municipally sponsored airports, and others are based on private strips. This proposal will not benefit municipal airport sponsors, and we are told that data/revenue generated by those aircraft in this proposal will not be shared with those sponsors.

The Alaska Airmen also understand the commercial carrier certificate of compliance program that DOT&PF undertakes and that a significant component of this proposal will help streamline that process. However, the estimates of revenue generated in this proposal are heavily weighted to the noncommercial owners, yet the majority of the expenses for developing and implementing this program is for the certificate of compliance issued to commercial carriers. This program disproportionately burdens a vast number of aircraft owners and doesn't pass a "red-face" test.

To complicate matters, the amount of proposed revenue from this program (\$1.5 million) is overshadowed by the potential revenue of the fuel tax increase Bills in the Alaska Legislature (\$10 million). The Alaska Airmen fears that the estimates to spool up and then operate this new program are too low and that net revenue with this proposal will diminish resulting in the fee increasing over time.

This proposal, if approved, would cause the Alaska Airmen Association to remove our support, and actively encourage our members to comment against, the fuel tax increase bills that are currently in both houses of the Alaska Legislature. Our members understand the budget crisis DOT&PF faces and when polled overwhelming preferred a fuel tax increase over a new and burdensome aircraft registration program.

Thank you for allowing the Alaska Airmen to comment on this proposal. We look forward to continuing our work with DOT&PF, the FAA, and the Alaska Legislature to come up with solutions to the complex issue of planning, compliance, and funding the aviation system in the great state of Alaska.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam White".

Adam White
Government Affairs