

THIS IS A COMMENT TO DOCKET # FAA -2003-14951-1

The Israeli Association of General Aviation (also known as the Israeli Aircraft Owner and Pilot Association, hereafter the I-AOPA), has examined this Complaint, together with the allegations of misinformation made by the complainant (Woolsey), and the data and references he cites in support. Following this review, the I-AOPA concludes that all of the allegations of error made in the Complaint are, indeed, accurate. The I-AOPA further concludes that the data and other references Woolsey cites in support are both relevant to the allegations made, support those allegations, and are fairly and accurately presented in the Complaint. The I-AOPA finds no material error in any of the allegations made, or conclusions drawn, or in the data and other references cited. The I-AOPA further concludes that Woolsey's interpretation and application of the data and references he cites are well founded and warranted.

While the I-AOPA is not well versed in U.S. law, the I-AOPA believes the immediate relief Woolsey requests -- removal of the four referenced Pilot Age and Accident Rate Reports and the 1983 Golaszewski Flight Time Study from the FAA's archives and website, and public disavowal of their credibility for any purpose, including pilot age limitation analysis -- is warranted by the evidence presented. The I-AOPA believes that this is the minimum response that the FAA can undertake.

The I-AOPA notes that the Complaint takes no position on the age 60 rule, itself, either for retention or for change. The I-AOPA notes that the only issues raised in this Complaint are the validity of the data and analytical techniques employed by the FAA, and the accuracy of the results disseminated by that agency in both its current and its long-time defense of the rule. The I-AOPA would go further and suggest that the FAA, in its quest for the real safety record of Part 121 pilots, uses the data now available from countries where pilots over the age of 60 can fly the equivalent of Part 121 flights. For example, in this country where the mandatory retirement age was raised to 65, many pilots flew, or, or are still flying, past the age 60 and up to 65. These pilots have accumulated hundreds of thousand flying hours without a single accident or incident, and none was grounded on the basis of medical reasons.

The FAA is standard bearer around the world and its policies have a bearing on many other national aviation agencies. The I-AOPA believes that this case of an alleged generation and dissemination of misleading information, including statistical information, regarding the age 60 rule as is exposed in the Woolsey Complaint calls into question the agency's credibility in not just in the age 60 rule controversy, but eventually also in other of its technical, scientific, and regulatory endeavors and reporting. It is important for the international aviation community that the above mentioned immediate relief requested by Woolsey be applied.

CONCLUSION:

The I-AOPA fully supports the Woolsey Complaint and asks that immediate corrective remedies are applied as requested.

RESPECTFULLY

For the I-AOPA

Yaron Efrat, Adv. - President