

You state that all qualified organization will not be granted ODA, that only if the FAA see's a need and can monitor them. This would cause an unfair time and financial advantage to those who are qualified, but not granted simply by location or FAA need.

Also 183.47 (A) 2 states that the applicant "Have sufficient experience with FAA requirements, policy, processes, and procedures appropriate to the functions sought" This should be modified the state that the applicant have personel with suffivient.... Otherwise it could be misconstrued that the organization have the experience and eliminate start up or recently formed companies with qualified personnel from being designated.