September 23, 2020

Ms. Patricia Watts  
Grants Officer, Aviation Workforce Development Grant Programs  
NextGen Grants Management Branch  
Federal Aviation Administration  
800 Independence Avenue, NW  
Washington, DC 20591

Re: Aircraft Pilots Workforce Development Grant Program, Public Comments; Docket No: FAA-2019-0847

Dear Ms. Watts:

The undersigned organizations respectfully submit these comments in response to the above referenced Federal Register Notice of September 8, 2020 regarding the establishment of the aviation pilot workforce development grant program authorized by section 625 of the FAA Reauthorization Act of 2018 (PL115-254).

In moving forward with the Aircraft Pilots Workforce Development Grant Program, the FAA is taking an important step to enable the development of a diverse and well-prepared workforce that will be critical to maintaining and growing the safest and most reliable aviation transportation system in the world.

Airlines, aircraft manufacturers, cargo operators, and others have long predicted a shortage of pilots to move people and goods around the United States and the globe. While the current pandemic has led to a temporary decrease in some types of air transport activity, others, such as cargo operations, have seen new levels of demand. Ultimately, the long-predicted pilot shortage has not been eliminated, only deferred. At the same time, a spate of early retirements and pilots leaving the industry as a result of the pandemic could leave the aviation industry with an even greater pilot shortage than previously predicted once air transportation recovers, as it must.

The undersigned organizations strongly support the Aircraft Pilots Workforce Development Grant Program, through which the FAA is helping to ensure that the industry will have critical workers when they are needed. Providing funding to programs that develop and deliver high school aviation STEM curriculum will expand awareness of opportunities and prepare young people to pursue careers in aviation fields, particularly as aircraft pilots, aerospace engineers, and unmanned aircraft systems operators. Federal funding will also help ensure that students from less-privileged communities and diverse backgrounds will have the opportunity to discover, prepare for, and pursue these well-paying, rewarding, and essential careers.
Notice of Funding Opportunity (NOFO) Information

The request for public comment anticipates that all NOFO’s will remain open for 60 days, and the signatories to these comments understand that no grants will be awarded under this program before the 60-day application period has expired.

Funding Restrictions

The FAA proposes to cap the use of grant funds for Indirect and Administrative costs at 5% of the total award.

The undersigned appreciate the FAA’s desire to minimize the amount of grant funding used for Indirect and Administrative costs but recommend that the cap be changed to a de minimus rate of 10% of the total award in keeping with a standard commonly used for Federal grants, including Airport Improvement Program (AIP) grants administered by the FAA. In addition to being a widely accepted standard, this de minimus rate of 10% more accurately reflects the costs associated with administering curriculum development and distribution as well as educator professional development while ensuring that the bulk of grant funds are directed toward program development and distribution.

The undersigned applaud the FAA’s efforts to support the aviation workforce development needed to ensure the future of the U.S. aviation system and hopes it will continue this work by promptly and thoughtfully reviewing the comments, publishing the funding opportunity, and awarding grants under the Aircraft Pilots Workforce Development Program.

Sincerely,

Aircraft Owners and Pilots Association
Aeronautical Repair Station Association
Cargo Airline Association
Experimental Aircraft Association
General Aviation Manufacturers Association
Helicopter Association International
International Council of Air Shows
National Business Aviation Association