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June 2, 2022

Dwayne C. Morris  
Federal Aviation Administration  
800 Independence Ave. SW  
Washington, DC 20591

**Re: Docket Number FAA-2022-0455; Clearance of a Renewed Approval of Information Collection: Certification of Airmen for the Operation of Light-Sport Aircraft (Forms 8130-15, 8710-11 and 8710-12)**

The Aircraft Owners and Pilots Association (AOPA) is the world's largest aviation membership association representing pilots, aircraft owners, and aviation enthusiasts. AOPA serves its membership through advocacy and promotion of the safety and fun in general aviation flying, and respectfully submits this comment on behalf of its more than 300,000 members in response to a request for comments involving a renewed approval of information collection for forms 8130-15, 8710-11 and 8710-12.

### **I. FAA Form 8710-11**

Many FAA Forms approved for collection of information include important and helpful instructions on how to complete complex and lengthy forms. However, it does not appear FAA Form 8710-11 has any instructions for the applicant to reference. Without such instructions, applicants may be unable to complete the form or may incorrectly answer questions on the form. In addition, providing instructions could easily decrease the estimated 3,400 hours per year for applicants to complete the form. To the extent that instructions have not been created or are not readily available, AOPA recommends the FAA create appropriate and clearly worded instructions and/or make such instructions readily available and easily accessible to those completing the form.

Question I.Za. on FAA Form 8710-11 asks, "Have you ever been convicted for violation of any Federal or State statutes relating to narcotic drugs, marijuana, or depressant or stimulant drugs or substances." However, unlike Question I.O. on FAA Form 8710-1, FAA Form 8710-11 does not instruct applicants to exclude alcohol offenses involving motor vehicles (likely due to the fact sport pilots need not hold a medical certificate). Some sport pilots may choose to hold medical certificates which may result in an applicant reporting the same event on multiple forms. AOPA recommends Question I.Za. on FAA Form 8710-11 be amended to clarify whether alcohol offenses (generally) and those involving motor vehicle actions (specifically) should be reported on the form.

AOPA appreciates the FAA's consideration of our comment on this important issue with safety, transparency, fairness, and accuracy in mind. Please feel free to contact me at 202-737-7950 if you have any questions.

Sincerely,



Christopher J. Cooper  
Senior Director, Regulatory Affairs

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of general aviation and aircraft owners. AOPA's mission is to effectively serve the interests of its members and establish, maintain, and articulate positions of leadership to promote the economy, safety, utility, and popularity of flight in general aviation aircraft. Representing two-thirds of all pilots in the United States, AOPA is the largest civil aviation organization in the world.