



601 Pennsylvania Ave. NW
North Building, Suite 250
Washington, D.C. 20004

202-737-7950

www.aopa.org

July 18, 2022

Claire Little
National Aeronautics and Space Administration (NASA) Clearance Officer
NASA Headquarters
300 E Street SW
Washington, DC 20546

Re: Docket Number 22-036; *Information Collection Request: NASA Aviation Safety Reporting System (ASRS) and Related Voluntary Safety Reporting Systems (OMB Number 2700-0172)*

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 an information collection request for the NASA Aviation Safety Reporting System "General Report Form" applicable to pilots, dispatchers, ground ops, & other.

Instructions

Initially, we note that there are no clear instructions available to the public on how to complete the NASA ASRS report. Rather, without any point of reference, reporters are expected to inherently understand how to complete the form. The inclusion of easily understood instructions would help to eliminate many questions AOPA fields concerning the proper completion of the NASA ASRS report form and ensure reporters are submitting accurate and consistent information.

Identification Strip

The top portion of the form, identified as the "identification strip" and is returned to the reporter via U.S. mail, is the only proof acceptable to the FAA of the submission of the report concerning a specific incident or occurrence per FAA Advisory Circular AC 00-46F, paragraph 10.2. This identification strip can be enhanced in several ways.

First, the identification strip should include an option to be emailed back to the reporter, rather than always being sent via U.S. mail. There are significant delays associated with the processing of ASRS reports (e.g., recent reports indicate approximately 8 weeks between the time a report is

submitted, and an identification strip is received in the mail), and any effort to expedite the return of the identification strip should be explored.

Second, the identification strip requires the reporter to indicate the “Type of event/situation” being reported in open-text form. Putting aside any concerns regarding improper use of reporter-entered “type of event/situation” by FAA personnel, including aviation safety inspectors and enforcement counsel, NASA should consider replacing the open-text “Type of event/situation” box with a tailored drop-down menu with selections such as “regulatory non-compliance,” “operational concern,” “aircraft accident,” etc. Should NASA elect to replace the open-text format with a drop-down menu, it is important that any selection regarding “aircraft accident” include a conspicuous warning that accidents are wholly excluded from the NASA ASRS and will be forwarded immediately to the NTSB and FAA without being deidentified, as indicated in FAA Advisory Circular AC 00-46F, paragraph 10.1.2.

Additionally, the “Date of Occurrence” box on the identification strip could be enhanced by including an option for the reporter to include the date they became aware of the occurrence. FAA Advisory Circular 00-46F, paragraph 12.3.4., makes clear that the waiver of imposition of sanction may be available if a NASA ASRS report is filed more than 10 days after the occurrence so long as the NASA ASRS report is filed within 10 days after “the person became aware or should have been aware of the violation.” The inclusion of a “date upon which you became aware of the occurrence” box in the identification strip would provide an easier method by which a person could prove a NASA ASRS report was filed within 10 days of the person becoming aware of the occurrence rather than relying on other less persuasive evidence. This could also assist in situations where the “date of occurrence” is not obvious, such as in the situation of a discovered airworthiness issue that may have been present for multiple flights, the origin of which is unknown.

Additional Solicitation of Information

Regarding the body of the NASA ASRS report form, the “Reporter” section immediately below the identification strip should be revised to make clearer the appropriate selection. For example, the use of non-standard terminology, including the terms “captain” and “first officer,” often create confusion in the completion of the NASA ASRS report form. It is worth noting that the terms “captain” and “first officer” are industry parlance and do not appear in 14 CFR Part 1, 61, 91, 119, 121, or 135. The same concerns ring true in the “Mission” section under the “Aircraft” heading of the NASA ASRS general report form in the inclusion of the term “ferry.” It is unclear if the term “ferry” is to mean an aircraft repositioning flight or a flight conducted pursuant to a special flight permit issued pursuant to 14 CFR Section 21.197 and/or 21.199, both of which is commonly referred to as a “ferry flight.” To this end, the remainder of the NASA ASRS report form should be reviewed by NASA to eliminate the use of industry parlance and other non-standard terminology.

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,

A handwritten signature in black ink, appearing to read "Christopher J. Cooper".

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.