

P.O. Box 16962 ALEXANDRIA, VIRGINIA 22302

July 5, 2021

Kathleen Silbaugh, Esq. General Counsel NTSB 490 L'Enfant Plaza East SW Washington DC 20594.

Re: Docket No. NTSB-2021-0005; Paperwork Reduction Act Notice

Dear Ms. Silbaugh:

AMOA is the national trade association representing federally certificated air carriers working together to improve safe air medical transportation. AMOA's 20 members conduct over 90 percent of the air medical operations across the United States. We are writing in reference to the NTSB's Paperwork Reduction Act notice (Notice) proposing to change NTSB Form 6120.1 so as to require a pilot, by signing the form, to consent to release of information provided therein.

The Notice states, in part:

Specifically, the NTSB is updating the instructions by . . . informing all pilots and operators that the information provided on the form is subject to public release; notably, the agency is also updating the form's certification statement to include that by signing the document, the pilot/operator consents to the public release of the information contained therein. 86 Fed. Reg. 23745 (May 4, 2021).

By not specifically excluding it, this statement implies that *all* information provided on the form, including a pilot's birthdate, address and signature, will be subject to public release, a change in NTSB practice. Further, it suggests that the pilot, by signing the form, consents to the public release of *all* information provided on the form, including private information.

We request clarification as to whether this is the NTSB's intent.

We are grateful for the opportunity to comment.

Sincerely,

Sally Veith

Executive Director

Air Medical Operators Association