

RIN 2120-AL72

- **A timely and appropriately structured SFAR to enable “powered lift” aircraft operations is critical to the United States since it can enable:**
 - **US global leadership**
 - **Introduction of extremely safe and environmentally friendly aircraft designs that:**
 - Provide increased connectivity throughout a region
 - Enhance and complement current transit systems
 - Increase equity and access
 - Provide significant economic impact, including spurring economic development & job creation
 - Improve utilization of existing infrastructure
- **The SFAR *must* provide a level of safety consistent with existing Part 91 and Part 135 operations, reflective of operations of existing Part 23 and Part 27 small (i.e., “normal category”) airplanes and helicopters**
 - **Consistent with safety continuum concepts that underpin FAA’s entire regulatory structure**

FAA Powered-Lift SFAR is Needed Now

SFAR status:

- The Powered-Lift SFAR rulemaking should be prioritized to complete final rule issuance as early as possible in 2024
 - Supports FAA's commitment to enable entry-into-service by 2025
- Lack of transparency into SFAR development and lack issuance of the SFAR NPRM and final rule creates uncertainty and unpredictability for OEMs and operators
- U.S. industry is at competitive disadvantage due to current lack of ability to plan and execute to our 2025 operational goal

Aircraft with Single Pilot Controls

- Like many civilian and military aircraft, most eVTOL aircraft are equipped with a single set of flight controls
- eVTOL aircraft are designed using the simplified vehicle operations (SVO) concept that leverages advanced automation to allow the pilot to more safely prioritize flight management
 - Aircraft power management is fully integrated for all motors, unlike conventional aircraft
- Current regulations permit the training and checking of pilots in aircraft with a single set of pilot controls (14 CFR part 61.45(e), 61.64(f & g))
- Type rating evaluations must be conducted according to the FAA's highest standard, regardless of pilot certification level (FAA Order 8900.1, volume 5, chapter 2, section 19, paragraph 5-728)
- The FAA should not introduce new regulations that levy increased requirements beyond long established and successful training and evaluation regulations for single pilot control aircraft
- Requiring dual flight control stations or an Airline Transport Pilot (ATP) multi-engine rating will significantly impact the economic viability of eVTOL operations, US competitiveness and US job creation along with public safety and environmental benefits

Flight Simulation

- Use of flight simulation capabilities is critical and improves safety
- Virtual reality (VR) flight simulation has been used by the Air Force and Navy for flight training since 2021
- Both the Air Force and Navy have reported increased pilot performance and significant decreases in training time when VR simulation has been used
- The FAA should enable extensive use of simulator capabilities, including VR flight simulation

