



The Honorable Bill Shuster
Chairman
House Transportation and Infrastructure Committee
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Peter A. DeFazio
Ranking Member
House Transportation and Infrastructure Committee
U.S. House of Representatives
Washington, D.C. 20515

Dear Chairman Shuster and Ranking Member DeFazio,

Helicopter Association International (HAI) wishes to express its thanks for holding the February 10 committee hearing to address lawmaker and industry concerns about separating air traffic control (ATC) from the Federal Aviation Administration (FAA). While the testimony, committee members' remarks, and the question-and-answer sessions with witnesses failed to sway our opinion of the legislation, it was nonetheless enlightening and helpful.

Helicopter operations are unique in the aviation industry. Under the current system, the regulatory authority has significant subject-matter expertise in those unique procedures and protocols. We know that when we have concerns, they will be addressed by people who understand the nature of helicopter operations. And we have confidence that if our concerns are not adequately addressed, we can take the matter to Congress as the oversight authority.

We have no confidence that the proposed board, with only two seats for general aviation and no requirement that either of those have helicopter expertise, would understand our industry's concerns or feel compelled to address our particular air traffic control needs. Due to the structure and governance of the proposed corporation, we are concerned that our members will lose access to the full national system of airspace and airport infrastructure, and that technological navigation advances to meet the specific needs of helicopter operations will not be adequately considered or funded. Without HAI, the recognized helicopter industry representative, having a seat on the proposed board, our sector of the aviation industry will lose its voice in air traffic control matters.

We also respectfully disagree that general aviation is exempted from user fees. Under the widely accepted definition of general aviation as everything other than scheduled Part 121 air carrier or military, Part 135 is general aviation. The proposed legislation would charge fees to any operation seeking to generate revenue from the use of aircraft. Therefore the overwhelming majority of HAI's operator members — 85% of whom are small businesses operating between one and five helicopters — would be subject to user fees.

A large portion of the aviation industry has significant concerns about the bill as written. We strongly urge you to slow the process down and take more time to consider those concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matthew S. Zuccaro", with a long horizontal flourish extending to the right.

Matthew S. Zuccaro
President, CEO
Helicopter Association International

