



November 27, 2018

Representative Triston Cole, Chairman
House Transportation and Infrastructure Committee
124 North Capitol Ave.
Lansing MI, 48909

RE: House Bill 6436

The Aircraft Owners and Pilots Association (AOPA) is the world's largest aviation organization, representing 320,000 pilots, aircraft owners, and aviation enthusiasts nationwide, including over 8,000 in the state of Michigan. On behalf of our membership, AOPA strongly opposes House Bill 6436 in its entirety. The legislation is misguided in operations of flying clubs, and the legislation could have an unintended and detrimental impact on general aviation activities in the state.

The bill fails to identify that a flying club, as defined by FAA Order 5190.B (Airport Compliance Manual) and Chapter 259.91 of the Aeronautics Code of the state of Michigan, is a not-for-profit entity organized for the purpose of providing aircraft for their personal use and enjoyment only. The ownership of aircraft is to be equally vested by membership. The FAA and the state of Michigan do not view a flying club as a commercial operation. The language in House Bill 6436 is in direct conflict with FAA Order 5190.6B and Aeronautics Code 259.91, lumping flying clubs into "commercial operations". AOPA believes that this legislation, if passed as written, will negatively impact the current operation of flying clubs and the formation of future flying clubs in the state of Michigan.

Flying clubs provide pilots access to aircraft at a reasonable cost, and AOPA actively promotes the creation and use of Flying Clubs across the nation. Our database currently shows 51 active Flying Clubs in Michigan. At least 6 flying clubs are based and operate at private airports across the state. These include:

Kittyhawk Soaring Club	Rossettie Airport	Wetland, MI
N7YM flying club	Riverview Airport	Jenison, MI
Delta Bravo Aviation flying club	Riverview Airport	Jenison, MI
Sandhill Soaring Club	Richmond Field	Gregory, MI
EAA Chapter 77	Dalton Airport	Flushing, MI
Brighton Flying Club	Brighton Airport	Brighton, MI

Private landing areas are hubs of operations for flying clubs, soaring clubs, ballooning operations, seaplane bases, skydiving operations, aerial agricultural operators, medical airlift flights, and maintenance facilities. These operations provide an economic engine for local



communities by employing flight operation staff, aviation maintenance technicians, and other support positions. In many cases, private airports are also housing communities that allow aircraft owners to reside on an airport. These communities provide a tax base for local jurisdictions.

Language in this bill will negatively impact private airport operations when limited to 10 operations per day. The FAA defines an "operation" as either a take-off or landing. For example, a soaring (glider operation) utilizes a tow plane to tow the glider to a suitable altitude before release. The entire operation consists of 2 takeoffs, and 2 landings. One glider operation will account for 4 operations, allowing only 6 more for the day. The second glider and tow plane will be able to land legally, but a third glider tow operation would be restricted by the legislation as written. The language in this bill is severely short-sighted and does not account for what operations are realistic at private airports. The ability for private airport owners to be granted more operations by the local governing body is cumbersome, burdensome, and allows individual jurisdictions to dictate an arbitrary number of operations. AOPA and our membership strongly disagree with this method, as it does not exist in any other state.

AOPA's feels this legislation conflicts with established state and federal code regarding flying clubs and significantly impacts operations at private landing areas. We strongly oppose the bill as written.

Sincerely

Kyle Lewis

Regional Manager for Government Affairs and Airport Advocacy / Great Lakes Region, AOPA

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