



April 16, 2024

The Honorable Brian Schatz  
 Chairman  
 Senate Appropriations Subcommittee on  
 Transportation, Housing and Urban  
 Development, and Related Agencies  
 Room S-128, The Capitol  
 Washington, D.C. 20510

The Honorable Steve Womack  
 Chairman  
 House Appropriations Subcommittee on  
 Transportation, Housing and Urban  
 Development, and Related Agencies  
 2358-A Rayburn House Office Building  
 Washington, D.C. 20515

The Honorable Cindy Hyde-Smith  
 Ranking Member  
 Senate Appropriations Subcommittee on  
 Transportation, Housing and Urban  
 Development, and Related Agencies  
 S-146, The Capitol  
 Washington, D.C. 20510

The Honorable Mike Quigley  
 Ranking Member  
 House Appropriations Subcommittee on  
 Transportation, Housing and Urban  
 Development, and Related Agencies  
 1036 Longworth House Office Building  
 Washington, D.C. 20515

Dear Chairman Schatz, Chairman Womack, Ranking Member Hyde-Smith, and Ranking Member Quigley:

The Aerospace Industries Association (AIA) represents more than 320 aerospace and defense companies, from America's leading manufacturers of commercial aircraft, engines, satellites, and launch vehicles, to family-owned businesses comprising our supply chain. Our industry contributes daily to our country's safety, security, and success. As a major driver of the U.S. economy, we employ more than 2.2 million Americans across all 50 states, contributing \$418 billion to the nation's GDP in 2022 alone. Civil aviation is a critical sector of the U.S. economy and the manufacturing industry's largest contributor to a positive U.S. trade balance. Developing a proper policy framework and aligning it with federal investment and incentives can help propel these advancements even further. Upcoming appropriations legislation provides us with a unique opportunity to do just that. AIA appreciates the strong support for FAA programs provided in past years by the appropriations committees, and respectfully makes the following requests related to FAA programs in the Department of Transportation, Housing and Urban Development and Related Agencies Appropriations Act, 2025.

### **OPERATIONS**

#### **Operations Program (\$10 million increase)**

AIA is pleased to see a meaningful increase to FAA's Operations appropriation when the overall cap on discretionary spending is so tight. This account finances critical improvements to aviation safety while simultaneously responding to rapidly expanding industries in commercial space and non-traditional forms of aviation. Unlike other sectors of our economy, the growth or stagnation of these industries is directly tied to regulatory actions by the federal government. However, AIA notes that, under the proposed budget, FAA's Aircraft Certification Service would receive a disproportionately low amount of the increase. As you know, Congress enacted legislation in December 2020 that required significantly higher staffing, training, and overall resources from the Aircraft Certification Service. Furthermore, it is likely that



Congress will pass additional legislation affecting the certification process this year. Consequently, in FY25 we believe the Aircraft Certification Service should receive no less of an increase than provided to the agency's overall operating budget. This would provide an increase of approximately 7 percent next year instead of 4 percent and would more effectively address Congressional initiatives. We appreciate the past support of the Appropriations Committees and request an additional \$10 million in FY25 specifically for the Aircraft Certification Service.

#### **Address Aircraft Certification Reform Legislation (\$6.7 million)**

AIA supports the FY25 president's budget request of \$6.7 million within the Office of Aviation Safety (AVS) to address the requirements in the Aircraft Certification, Safety, and Accountability Act (ACSAA). This legislation created significant new responsibilities for the FAA that affect staffing, training, and workload requirements. In particular, the FAA is continuing to develop a specialized human factors workforce that this funding will help address. At the same time, emerging technologies and new aviation entrants require increasing resources and attention. The FAA notes that the AVS workforce currently utilizes multiple tools that do not adapt to the changing needs of the aviation industry. AIA supports investments in capabilities such as the Work Tracking System and Certification Project Notification system. We encourage the FAA to leverage these investments so that applicants and the agency can track the real-time status of certification-related activities, especially those that involve multiple lines of business, including the status of a specific application or document under review, which offices are scheduled to review the submission, and timelines for completion of the process. The House and Senate FAA Reauthorization bills currently pending in Congress include provisions authorizing such a tracking system to the benefit of both the agency and certificate applicants.

#### **Global Leadership (\$1.8 million)**

AIA supports the FY25 president's budget request of \$1.8 million within the Office of Policy, International Affairs & Environment (APL). This request will support FAA's efforts to maintain its reputation as a respected global leader in aviation safety. It is important to establish a defined presence with partner nations to ensure high standards are met, are sufficient to ensure safety of the U.S. manufactured fleet and promote alignment with the U.S. regulatory framework. This request is consistent with Section 502 of H.R.3935, *Securing Growth and Robust Leadership in American Aviation Act* and Section 821 of S.1939, *FAA Reauthorization Act*.

#### **Advanced Air Mobility Infrastructure Pilot Program (\$12.5 million)**

AIA thanks the committees for the inclusion of the Advanced Air Mobility Infrastructure Pilot Program in FY23. This program is essential for communities around the country to begin planning for the inclusion of AAM within their transportation systems. We urge the committee to appropriate \$12.5 million in FY25 so this important grant program can begin.

#### **Aviation and Aerospace Talent Development Program (\$3.7 million increase)**

AIA supports the FY25 president's budget requested increase of \$3.7 million in the FAA's Office of Policy, International Affairs, and Environment (APL) for the Aviation and Aerospace Talent Development Program. The request includes funding for the Science, Technology, Engineering, and Math Aviation and Space Education (STEM AVSED) program, which helps K-12 students explore aviation and aerospace career options while promoting STEM learning, as well as expanded internship opportunities at Minority-



Serving Institutions (MSIs) and grants under the Samya Rose Stumo Air Grant fellowship. These expanded programs will broaden FAA’s outreach across the country and engage prospective aviation and aerospace students concerning careers in the aerospace industry and the skills and training required for those jobs.

### **Powered-Lift Airspace Integration Report to Congress**

Ensuring adequate staffing and training for controllers is essential to maintain the safety of the National Airspace System, especially given the near-term commercial deployment of powered-lift aircraft. This request seeks a report from the FAA’s Air Traffic Organization (ATO) on the ATO’s plan for incorporating powered lift operations into ATO operations.

#### **Requested Report Language:**

*Powered Lift Operations* — The Committee directs the FAA to ensure that it is fully prepared for powered lift operations, and notes that several aircraft are in the certification process. As such, the Administrator shall, within 180 days of enactment of this act, provide to the Committee a report on the ATO’s plan for incorporating powered lift operations into ATO operations, including staffing needs, the identification of routes needing modification, the schedule for implementation of these changes, and updated training at required facilities.

### **Special Federal Aviation Regulation for the Integration of Powered Lift**

On June 14, 2023, the FAA issued a notice of proposed rulemaking entitled, “Integration of Powered-Lift: Pilot Certification and Operations; Miscellaneous Amendments Related to Rotorcraft and Airplanes.” The action proposes a Special Federal Aviation Regulation (SFAR) to establish the requirements for pilot certification and operation of powered-lift aircraft. To date, Industry has been working closely with the FAA to provide feedback on this rule. The House-passed FAA reauthorization bill (Sec. 652) requires FAA to issue a final SFAR no later than thirteen months after enactment. The Senate-reported bill (Sec. 825) requires such action by December 31, 2024. The timely issuance of the rule is necessary to begin certification of powered-lift pilots, and to ensure a clear regulatory framework to ensure safety and facilitate industry growth in the U.S. and worldwide.

#### **Requested Report Language:**

*Powered Lift SFAR* – The Committee commends the FAA for issuing its proposed Special Federal Aviation Regulation (SFAR) entitled “Integration of powered-lift: Pilot certification and operations; Miscellaneous Amendments Related to Rotorcraft and Airplanes.” The Committee strongly believes that timely implementation of this regulation is key to ensuring that the United States remains the global leader in powered-lift technology, and notes that both the House and Senate expressed similar views in their respective versions of FAA Reauthorization legislation. As such, the Committee directs the agency to ensure that the SFAR is finalized by December 31, 2024, and that to the maximum extent possible, it ensures a path for existing pilot transition, consistent with International Civil Aviation Organization (ICAO) standards (ICAO Annex 1, 2.1.1.4 and ICAO Doc. 10103).

### **Upper Class E Traffic Management Initiatives (\$2 million increase)**

AIA supports an additional \$2 million to support the FAA’s Upper Class E Traffic Management (ETM) initiatives currently led by the Office of Unmanned Aircraft Systems Integration. Several U.S. companies



are developing and testing supersonic and hypersonic aircraft engines and aircraft that will eventually operate in upper Class E airspace. Additional funding will ensure that the FAA can continue to develop airspace management procedures for such operations. Moreover, additional funding for this initiative is critical to ensure United States leadership, in light of the European Aviation Safety Agency's comparable work to support 'High Altitude Operations' which has been ongoing for several years.

#### **Office of Commercial Space Transportation (\$57.1 million)**

AIA supports the FY25 president's budget request of \$57.1 million for the Office of Commercial Space Transportation (AST). With the increased number of launch and reentry licenses, AST requires this funding to maintain a timely approval process necessary for continued growth in the U.S. commercial space sector and to support U.S. government civil and national security launches.

### **FACILITIES & EQUIPMENT**

#### **Facilities & Equipment Program (\$3.6 billion)**

AIA supports the FY25 budget request of \$3.6 billion for FAA's Facilities and Equipment (F&E) appropriation. This appropriation upgrades and modernizes FAA's air traffic control and air traffic management systems, providing efficiencies and safety improvements for both commercial and general aviation users. Funding is needed to upgrade and replace aging facilities, modernize existing capabilities, respond to emergent safety issues such as runway incursions, and respond to the needs of emerging entrants. The FAA is under increased pressure to add resiliency, functionality and flexibility to an increasingly overburdened air traffic control (ATC) system. We believe the proposed increase is needed to provide a state-of-the-art ATC system at a time of growth and rapid change in airspace activity.

#### **Unmanned Aircraft Systems (\$25 million)**

AIA supports an additional \$5 million above the FY25 president's budget request of \$20 million for budget line 1A09 NextGen – Unmanned Aircraft Systems. The FAA's Airborne Collision Avoidance Systems X program (ACAS X) is developing a safety-enhancing replacement for the existing Traffic Alert and Collision Avoidance System to support NextGen operations. ACAS X is an enabling technology to support UAS operations (ACAS Xu) including small UAS (ACAS sXu), and rotorcraft (ACAS Xr). Detect and Avoid (DAA) systems and standards are necessary to enable uncrewed aircraft operations beyond visual line of sight and will increase the safety of existing aircraft operations. With an additional \$5 million, the FAA can complete the development and standardization of ACAS Xr for both crewed and uncrewed rotorcraft and electric vertical take-off and landing and the enhancement of ACAS Xu to support terminal area operations. Without additional resources, there will be delays in developing the technical standards and guidance materials necessary for innovative companies to begin developing these systems. Pushing these technology advancements into the future will reduce potential safety benefits and limit United States competitiveness.

#### **Automatic Dependent Surveillance-Broadcast NAS Wide Implementation (\$117.7 million)**

AIA supports an additional \$25 million over the FY25 president's budget request of \$92.7 million for ADS-B NAS Wide Implementation to fund an ADS-B Out Rebate program. This program is included in pending FAA Reauthorization legislation (Sec. 221 of H.R. 3935). Establishing such a program will increase ADS-B Out equipage, delivering safety benefits by reducing airborne collisions and modernizing our airspace.



The aviation industry has developed cost-effective solutions to equip light general aviation aircraft with ADS-B Out, and additional focus on expanding equipage can drive innovation, including the development of portable, battery-powered units. Despite proven safety benefits, more than 50,000 civilian aircraft are not equipped with ADS-B Out. While these aircraft cannot operate in airspace where ADS-B is required or require specific exemptions, the lack of universal equipage limits safety benefits, especially at thousands of non-towered airports in the United States. Consistent with Sec. 221 of H.R. 3935, this funding will provide owners of single-engine piston aircraft, not currently equipped with ADS-B Out technology, a rebate of no more than \$2,000 to install this safety-enhancing technology.

#### **Telecommunications Infrastructure Modernization (\$419.5 million)**

AIA supports the FY25 president's budget request of \$419.5 million for modernization of the FAA's Telecommunications Infrastructure (FTI). Additionally, AIA recommends that within the funding provided in the request, the FAA should ensure that the migration from existing Time Division Multiplexing (TDM) technology to a more modern Internet Protocol (IP) infrastructure is fully funded and prioritized, in line with the FAA's indication of this as critical for the safety of the National Airspace System, as well as its precursor status for successful FAA Enterprise Network Services (FENS) implementation.

#### **Commercial Space Integration (\$4.5 million)**

AIA supports the FY25 president's budget request of \$4.5 million for space data integration. This funding will further the development of tools to integrate commercial launch and aviation more efficiently in the national airspace. With continuous development of next-generation space technologies, the FAA needs to continue expanding its capability to track launch and reentry operations quickly and accurately in the airspace. This funding will allow the FAA to monitor and respond automatically in an increasingly complex environment.

### **RESEARCH, ENGINEERING & DEVELOPMENT**

#### **Environment and Energy Research Program (\$21 million)**

AIA supports the FY25 president's budget request of \$21 million for the FAA's Environment and Energy Program which leads the FAA's initiatives to create a cleaner and more efficient air transportation system. This also finances critical research by the university consortium known as ASCENT and supports FAA positions and leadership in international environmental bodies including the International Civil Aviation Organization's Committee on Aviation Environmental Protection (CAEP). Continued funding for this account will ensure that the FAA has the resources needed to mitigate aviation noise and emissions over the coming years, which is essential to ensure that the U.S. aviation industry can continue to grow and remain competitive.

#### **Environmental Research – Aircraft Technologies and Fuels (\$70 million)**

AIA supports the FY25 president's budget request of \$70.9 million for the FAA's Environmental Research - Aircraft Technologies and Fuels programs. This account funds the Continuous Lower Energy, Emissions and Noise (CLEEN) program. CLEEN has developed and demonstrated, at high technology readiness levels (TRLs), several aircraft technologies that reduce both emissions and noise. Given the strong and continuing demand for this program and the leveraging of private sector funding, we urge Congress to provide \$2.9 million above FY24 and with increased program funding, we encourage the FAA to consider proposals from new entrants to the aviation system.





### **Workforce Grant Programs – Maintenance Technicians, Pilots, and Aviation Manufacturing (\$15 million)**

AIA strongly supports no less than the FY24 appropriation of \$15 million for the workforce development grant program authorized by Section 625 of the 2018 FAA Reauthorization Act. This program continues to help address critical shortfalls in the aviation maintenance workforce, and the same amount for grants to support the commercial pilot workforce. This funding has broad stakeholder support and is needed to address well-documented shortages in these workforces that threaten to undermine the growth and competitiveness of the aviation sector. There is strong demand for the continuation and expansion of this program to aviation manufacturing indicated by Section 301 and 302 in H.R.3935, *Securing Growth and Robust Leadership in American Aviation Act* and Section 501 in S.1939, *FAA Reauthorization Act*. Consistent with these recent proposals, we urge Congress to continue this important program in FY25.

### **Aircraft Radio Altimeter Development, Testing, and Certification (\$10 million)**

AIA thanks the committee for the inclusion of \$5 million in FY24 to accelerate testing, certification, and implementation of new radio altimeter (RA) capabilities consistent with the next generation of avionics standards. The aviation industry faces a January 2028 deadline at which time the 21 5G C-Band licensees can operate their networks at the full limits of the FCC Report and Order; the 2028 deadline was established to provide time for the development of new RA performance standards as well as associated design, certification, and installation of these units onto aircraft. An additional \$10 million in funding for FY25 would continue to accelerate new technologies with the goal of reducing long-term and future disruptions to U.S. air transportation caused by the potential interference of 5G signals.

### **Commercial Space Transportation Safety (\$5.35 million)**

AIA supports no less than the FY25 president's budget request of \$5.35 million for the Commercial Space Transportation (CST) program. With a focus on public safety research, this funding is vital as this industry continues to develop and commercial space operations integrate into the airspace. This funding also allows for TNT equivalency testing to improve the FAA's ability to predict public risk as new commercial launch capabilities are enabled.

AIA and our member companies thank you for your leadership and your consideration of our funding priorities for the FAA. For further information, please reach out to [Jeffrey.Wilson@aia-aerospace.org](mailto:Jeffrey.Wilson@aia-aerospace.org).

Respectfully,

A handwritten signature in black ink that reads 'Jeffrey Wilson'.

Jeffrey Wilson  
Senior Director of Legislative Affairs  
Aerospace Industries Association