July 24, 2023

Brandon Roberts
Executive Director, Office of Rulemaking, ARM-1
Federal Aviation Administration
800 Independence Avenue, SW
Washington, DC 20591

Re: Recommendation Report – Airman Certification System Working Group – PTS to ACS Priorities

Dear Mr. Roberts,

On behalf of the Aviation Rulemaking Advisory Committee (ARAC), I am pleased to submit the enclosed Recommendation Report from the Airman Certification System Working Group (ACSWG)

At the July 20, 2023, ARAC meeting at FAA's Washington, DC headquarters, as the ACSWG chair, I presented an overview of the working group recommendations and prioritized list of standards to be transitioned from Practical Test Standards (PTS) to Airman Certification Standards (ACS). The list was based on applicant volume and in consideration of the need for updated FAA standards given today's equipment, rules, procedures, and impact on the safety within the National Airspace System (NAS). Additionally, the corresponding Handbooks are identified so these can be developed alongside the ACS.

The prioritized list should serve as a basis for both the FAA and industry to focus our limited resources to accomplish the task. I would encourage the agency to utilize industry as much as practical and leverage the ACS structure and subject matter expertise, alongside the established FAA development processes supported with the Call-to-Action recommendation that was previously submitted to ARAC and Congress.

ARAC members who attended the meeting, in-person and virtually, accepted the report, as presented. With that, I would welcome the agency's timely review and implementation of the working group's recommendations.
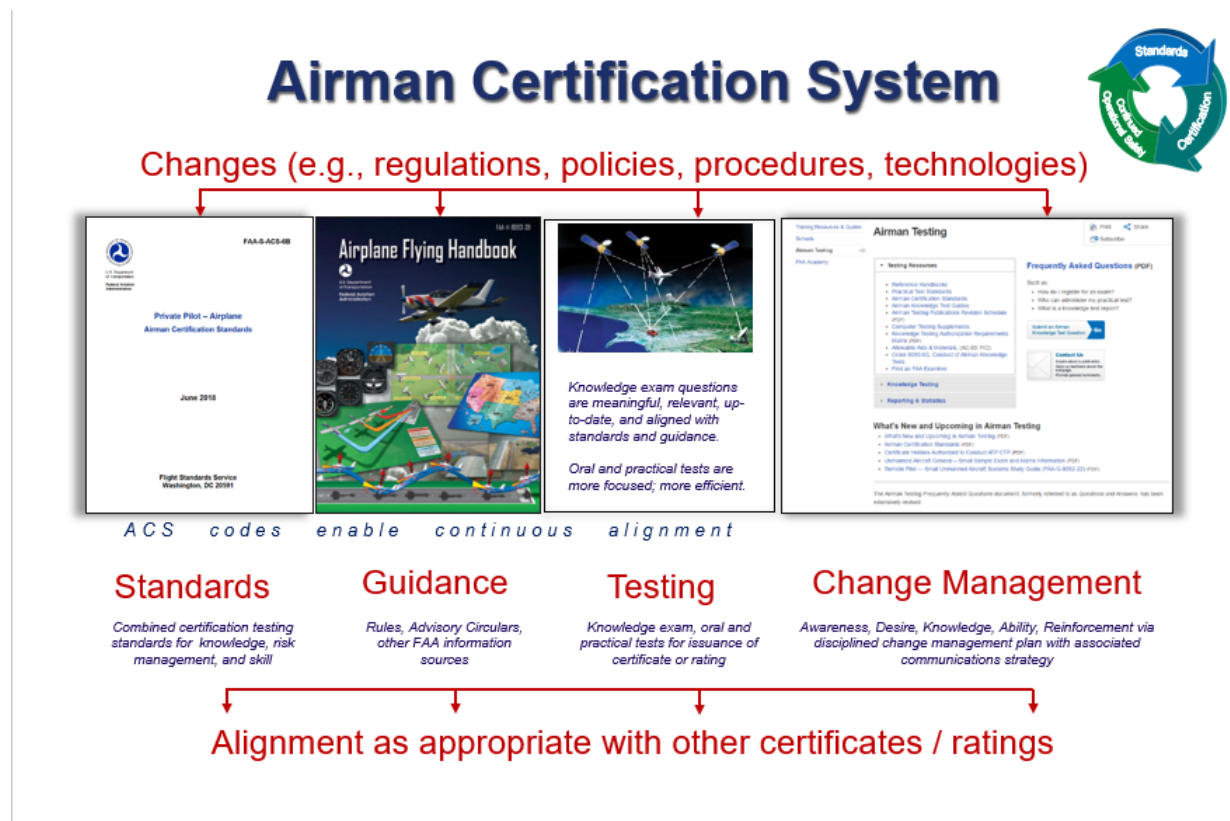
Sincerely,

David Oord
ARAC Chair

Enclosure: Recommendation Report – Airman Certification System Working Group – PTS to ACS Priorities

TO: David Oord, ACS Working Group Chair
FROM: Jackie Spanitz, ACS Work Group Lead
SUBJECT: Priorities for transitioning PTS to ACS
DATE: July 12, 2023

On behalf of the Airman Certification System Working Group (ACSWG) Leads, I submit this recommendation to the Aviation Rulemaking Advisory Committee (ARAC) for consideration.

The working group leadership has developed the following list, which prioritizes the transition from Practical Test Standards (PTS) to Airman Certification Standards (ACS), as well as updates for the existing ACS already in effect. This list is based on applicant volume and in consideration of need for updated FAA standards given today's equipment, rules, procedures and impact on the safety within the National Airspace System (NAS). Additionally, the corresponding Handbooks are identified so these can be developed alongside the ACS. This will ensure the ACS system is followed as intended:

These lists can serve as a basis for both the FAA and industry to focus our limited resources to accomplish the task. We encourage the agency to utilize industry as much as practical and leverage the ACS structure and subject matter expertise, alongside the established FAA development processes supported with the Call to Action recommendations . We collectively look forward to framing out the remaining components of the airman certification system and work together to maintain and improve it.

ACS Update Priorities: Review Federal Register Incorporation by Reference (IBR) comments in developing the new editions.

ACS	Last Updated (prior to IBR)	Affected Handbooks	Comments
ACS-15 Private Helicopter	2005, 2013	8083-21	
ACS-14 Instrument Helicopter	2010, 2013	8083-21	
ACS-16 Commercial Helicopter	2013	8083-21	
ACS-29 CFI Helicopter	2013	8083-21	
ACS-20A ATP Helicopter	1998, 2016	8083-21	
ACS-3 Instrument Powered Lift	NA	8083-25	Need a Powered Lift Handbook
ACS-2 Commercial Powered Lift	NA	8083-25	Need a Powered Lift Handbook
ACS-27 Private Balloon	1996	8083-11	
ACS-28 CFII Powered Lift	NA	8083-25, 8083-9, 8083-15	Need a Powered Lift Handbook;
ACS-17 ATP Powered Lift	NA	8083-25	Need a Powered Lift Handbook
ACS-6C Private Airplane	2019	8083-1, 8083-3, 8083-25	
ACS-8C Instrument Airplane	2019	8083-15, 8083-16	
ACS-7B Commercial Airplane	2018, 2019	8083-3	
ACS-25 CFI Airplane	2012, 2018	8083-25, 8083-9	
ACS-11A ATP Airplane	2019		
ACS-10B Removed/Unmanned	2018	8082-22	Need a Remote Pilot Handbook
ACS-1 Aviation Mechanic	2022	8083-30, 8083-31, 8083-32	

PTS to ACS Conversion Priorities

PTS	Last Updated (prior to IBR)	Affected Handbooks	Comments
8081-9E, CFII Airplane and Helicopter	2010, 2014	8083-9, 8083-15, 8083-16	
8081-10E, Aircraft Dispatcher	2013, 2018		Many applicants, international reach
8081-17A Private Balloon & Airship	1996	8083-11	
8081-18A Commercial Balloon	1997	8083-11	
8081-22A, Private Glider	1999, 2010	8083-13A	
8081-23B Commercial Glider	2006, 2014	8083-13A	
8081-8C CFI Glider	2006	8083-13A	
8081-15B Private Gyro	2005, 2013	8083-21 (need gyroplane Hdbok)	Building on ACS-15
8081-16C Commercial Gyro	2013	8083-21 (need gyroplane Hdbok)	Building on ACS-16
8081-7C CFI Gyro	2006, 2016	8083-21 (need gyroplane Hdbok)	Building on ACS-29
8081-29A Sport Airplane, Gyroplane, Glider, CFI	2004, 2014	8083-3, 8083-11, 8083-21, 8083-9	
8081-32A, Private Wt Shift & Pow Para	2004, 2017	8083-29, 8083-5	
8081-30A Sport Balloon	2014	8083-11	
8081-31A Sport Wt Shift & Pow Para	2017	8083-29, 8083-5	
8081-3B Recreational Airplane	2006		
8081-25C Parachute Rigger	2012		Very few applicants
8081-21A Flight Engineer	1999, 2018		Very few applicants