

# The European Association of Aerospace Industries



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31 May 2002  
CS/vk/25022

Mr. James Ballough  
Director, Flight Standards Service AFS-1  
Federal Aviation Administration  
800 Independence Ave., SW  
Washington DC 20591  
USA

**Subject: Proposed Exemption to 14 CFR 61.75**

Dear Mr Ballough,

In accordance with 14 CFR 11, we are petitioning for an exemption to 14 CFR 61.75 to permit the temporary validation/conversion of ATP or CPL/IR certificates issued by JAA member states to FAA ATP or CPL/IR certificates for the purpose of supporting the introduction of new commercial jet transports and for the conduct of functional check flights in US-registered airplanes.

This exemption is necessary to assure that manufacturer's pilots, holding CPL/IR or ATPL certificates and ratings issued in foreign states, may be permitted to support the introduction and test of new airplanes that are US registered. This issue has been a subject of discussion in FAA-JAA harmonization meetings for several years and it is intended that JAA states would be requested to allow similar credit for US airmen certificates when necessary to fly non-US registered airplanes.

AECMA is aware of the request made to you by AIA , and fully support this initiative. Mrs Régine Vadrot who represents AECMA in FAA / JAA Licensing Harmonization meeting will follow up this issue.

In discussing these issues, it should be noted that an exemption to FAR 61.77 was necessary for Airbus to perform routine delivery flight of US registered aircraft from Europe to the United States.

Although this exemption is needed, AECMA would recommend working towards harmonisation to find appropriate long-term solution accepted on both side of the Atlantic.

For your information AECMA is taking action to request a similar rule change from the JAA to permit temporary validation for pilots holding FAA ATPL or CPL/IR certificates, with appropriate ratings.

This request, which has been discussed at FAA/JAA Licensing Harmonization meetings in the past, will most probably be part of the discussion at the 19<sup>th</sup> annual FAA/JAA international conference in Phoenix.

Mrs Régine Vadrot can be reached at + 33 (0)5 61 93 20 63, fax +33 (0)5 61 93 22 54 or [regine.vadrot@airbus.com](mailto:regine.vadrot@airbus.com)

Looking forward to your guidance and comments at your earliest convenience,

Sincerely Yours

A handwritten signature in black ink, appearing to read 'C. Schmitt', with a horizontal line extending to the right.

Claude Schmitt  
Chairman AECMA Airworthiness Committee