

## Comment Matrix:

A Federal Register Notice published on June 8, 2023, (88 FR 37596) solicited public comment. Two comments were provided by August 7, 2023.

On July 27, 2023, the Law Offices of Robert M. Strumor, LLC, provided comments regarding the lack of clear instructions on reporting requirements. Excerpts from their comment document are:

“we also note the agency neglected to address confusion related to completion of some required information. Specifically, the electronic submission portal asks two lengthy questions that necessitate different answers depending on whether the submission is an initial or follow-up for a previously reported event.”

The intended responses for these two questions is to report new actions regardless if the incident has been previously reported to Security and Hazardous Materials Safety. A response in the “Statement” box should be used to provide clarification regarding previously reported motor vehicle actions. This sentiment is covered on our website, however, a new frequently asked question has been added to our website to address this ambiguity.

“Furthermore, the letter continues to lack clear instructions for respondents. Regrettably, the current (limited) guidance fails to help respondents understand that the reporting requirement is triggered by *any* suspension of driving privileges—namely a roadside pre-conviction administrative license revocation or suspension.”

Our website clearly annotates the definition of an administrative action, and although not a comprehensive list, examples of these actions are provided. A new FAQ has been added to further clarify reportable actions.

On July 17, 2023, a comment was received from Wendy McDowell stating, “In the interest of public safety I believe the collection of this data is imperative. It does not appear to be a financial burden on the pilot to have this information submitted. I suggest we continue to collect the data.”

The FAA plans on continuing the collection of this data.

In June of 2023, phone surveys were held with 10 airmen and asked the same questions. Below is the questions and responses.

1. How did you learn you were required to report this incident to the FAA?

Airman 1: Pilot School

Airman 2: Pilot School

Airman 3: Google and talked to Union Rep

Airman 4: Online research- and legal advice

Airman 5: Talked to attorney

Airman 6: He is an instructor and knew what to do

Airman 7: Flight School and medical

Airman 8: Pilot Training  
Airman 9: Pilot flight school  
Airman 10: Flight school

2. Were the instructions clear on what to report, to whom, and within how many days? Please explain.

Airman 1: Yes- Regulations are hard to read  
Airman 2: Yes- after talking to an attorney  
Airman 3: Yes – Union representative sent the link  
Airman 4: Yes  
Airman 5: Yes  
Airman 6: Yes  
Airman 7: Yes he knew the time frame, and No hard to find portal  
Airman 8: Yes  
Airman 9: Yes  
Airman 10: Yes

3. Did the airman choose to submit the letter via the online portal, send via fax, or send a hard copy via mail?

Airman 1: online  
Airman 2: online  
Airman 3: one line  
Airman 4: US Mail  
Airman 5: Portal  
Airman 6: Fax  
Airman 7: Portal  
Airman 8: Portal  
Airman 9: Online  
Airman 10: Online

4. How long did it take to create the notification letter and send it to the FAA?

Airman 1: not long easy  
Airman 2: 1/2 hour  
Airman 3: 5 minutes  
Airman 4: 1 hour  
Airman 5: 1/2 hour  
Airman 6: 10 minutes  
Airman 7: hour  
Airman 8: 20 minutes  
Airman 9: 30 minutes or so  
Airman 10: not long

5. Was the time burden associated with creating the submission reasonable?

Airman 1: pretty much  
Airman 2: Yes  
Airman 3: Yes

Airman 4: Somewhat  
Airman 5: Yes  
Airman 6: Yes  
Airman 7: It was ok  
Airman 8: Yes  
Airman 9: Yes  
Airman 10: Yes

6. What were the costs associated with sending the letter? (i.e. stamps, cost of paper & envelope, or did they fax it)

Airman 1: None  
Airman 2: None  
Airman 3: None  
Airman 4: Express mail over \$20.00  
Airman 5: None  
Airman 6: Over \$5.00  
Airman 7: None  
Airman 8: None  
Airman 9: None  
Airman 10: None

7. Do you have any suggestions for improving the process?

Airman 1: Had questions and hard to talk to real person (during Covid)  
Airman 2: None Easy to completed  
Airman 3: None with notification. Medical needs to be more responsive  
Airman 4: None  
Airman 5: None  
Airman 6: None  
Airman 7: Worked like a dream  
Airman 8: None  
Airman 9: None  
Airman 10: None

In response to Airman 1, question 7, the office phone line has always been answered by personnel Monday through Friday 8:00 a.m. to 4:30 p.m. CT.