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Federal Aviation Administration  
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*Delivered electronically via [www.regulations.gov](http://www.regulations.gov)*

**RE: DOCKET NO. FAA-2024-2690 — SAFETY ASSURANCE SYSTEM (SAS) EXTERNAL PORTAL**

The National Air Transportation Association (NATA) appreciates the opportunity to submit comments to the Federal Aviation Administration (FAA) on the Safety Assurance System (SAS) external portal and the agency's willingness to conduct this review in a public forum permitting maximum engagement from stakeholders and the public.

The SAS external portal provides a valuable opportunity with proper utilization for 14 CFR part 121, 135, 141, 142, 145, and 147 applicants and certificate holders (external users) to exchange information with the FAA employees within Flight Standards. NATA's efforts to engage the community for feedback included outreach with its Maintenance and Air Charter Committees in considering a variety of perspectives and industry input. In addition to this submission, NATA has encouraged its members to provide their own comments to the administration.

NATA represents nearly 3,700 aviation business locations across a broad cross-section of industry, including on-demand air charter air carriers and fractional ownership companies, maintenance facilities, FBOs, flight training providers, airport sponsors at general aviation airports, and others. The Association serves to elevate the safety and professionalism of its members by convening industry thought-provoking leadership on its policy committees, examining contemporary issues, and pursuing solutions that prioritize safety and economic viability.

NATA applauds the FAA's effort to provide external users a reliable way to submit documents to the FAA Principal Operations Inspectors (POIs) for review and approval via the SAS external portal. This platform has considerably streamlined communication and collaboration with Flight Standards employees, enhancing efficiency and accuracy in processing applications with each submission date stamped and sent to the assigned POI within the portal. NATA and its members would like to see the external portal expanded to include other processes and forms, such as the Operations Approval Safety System (OAPS) and the Web-based Operations Safety System (WebOPSS).

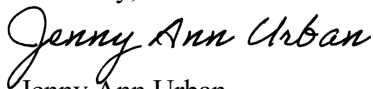
For the SAS external portal to be used effectively, it is critical that POIs check the portal regularly to retrieve external user submitted documents in a timely manner. Although NATA members strongly encourage the continued use of the platform, it is noted that many times they must follow up outside of the external portal via email or phone call to ensure the POIs are aware that documents have been submitted for their review.

Multiple POIs have specifically requested that operators submitting documents on the external portal perform this additional step, ultimately undermining the overall effectiveness and efficiency of the platform. NATA recommends POIs be required to utilize the system, check it on a daily basis, and respond within a reasonable timeframe. We encourage the FAA to implement system improvements, including targeted alerts to POIs when new account activity requiring action occurs.

Furthermore, many NATA members have experienced difficulty accessing the platform due to IT issues, such as the system being down for updates, correct usernames and passwords being rejected, and the FAA's IT team's lengthy response time in resolving technical issues or re-establishing system access. In order for the SAS external portal to be a valuable tool for both the industry and the FAA, it must work properly on a consistent basis.

NATA recommends that the FAA continue to leverage the SAS external portal, improve system efficiency and reliability, and expand its utility. We appreciate the FAA's effort to expand digitization of programs and welcome the implementation of these changes to the SAS external portal.

Sincerely,



Jenny Ann Urban

Vice President, Regulatory Affairs