UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT
100 EAST FIFTH STREET, ROOM 540
POTTER STEWART U.S. COURTHOUSE
CINCINNATI, OHIO 45202-3988

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Filed: September 10, 2026

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Re: Case No. 26-3823
Wings of Mercy, Inc., et al v. FAA, et al
Originating Case No. FAA-2024-2049

Dear Counsel,

This case has been docketed as number **26-3823** with the caption that is enclosed on a separate page. Please check the caption for accuracy and notify the Clerk's Office if any corrections should be made.

Before preparing any documents to be filed, counsel are strongly encouraged to read the Sixth Circuit Rules at www.ca6.uscourts.gov. If you have not established a PACER account and registered with this court as an ECF filer, you should do so immediately.

The following case opening items should be docketed with the Clerk's office by **September 24, 2026**. The Disclosure of Corporate Affiliations is now an automated entry. Filers may still use the form 6CA-1 located on the Court's website if the automated entry does not provide sufficient space. If payment did not accompany the petition for review, the $600 filing fee should also be paid by this date.

Petitioner: Appearance of Counsel
Disclosure of Corporate Affiliations
Application for Admission to 6th Circuit Bar (if applicable)

Respondent: Appearance of Counsel

These deadlines are important - if the initial case opening items are not timely filed and necessary fees paid, the case will be dismissed for want of prosecution. If you have questions after reviewing the rules, please contact the Clerk's office for assistance.

Sincerely yours,

Appeal Case Manager: Virginia
Direct Dial No. 513-564-7032

Enclosure

OFFICIAL COURT OF APPEALS CAPTION FOR 26-3823

WINGS OF MERCY, INC.; WINGS OF MERCY EAST MICHIGAN, INC.; AIR CARE ALLIANCE, INC.

Petitioners

v.

FEDERAL AVIATION ADMINISTRATION; BRYAN BEDFORD, in his official capacity as Administrator of the Federal Aviation Administration

Respondents

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No. ________________

IN THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

WINGS OF MERCY, INC.; WINGS OF MERCY EAST MICHIGAN, INC.; and AIR CARE ALLIANCE, INC.,
Petitioners

v.

FEDERAL AVIATION ADMINISTRATION; and BRYAN BEDFORD, in his official capacity as Administrator of the FEDERAL AVIATION ADMINISTRATION,
Respondents.

Partial Grant of Exemption No. 23553A, Regulatory Docket No. FAA-2024-2049; Surveillance for Charitable Medical Flight Exemptions, Notice No. N 8900.786

PETITION FOR REVIEW

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Counsel for Petitioners

Pursuant to 49 U.S.C. § 46110, the Administrative Procedure Act, 5 U.S.C. §§ 551–706, Federal Rule of Appellate Procedure 15(a), and 6 Cir. R. 15, Wings of Mercy, Inc., Wings of Mercy East Michigan, Inc., and Air Care Alliance, Inc. ("Petitioners") hereby respectfully petition this Court for review of the following orders of the Administrator of the Federal Aviation Administration: (1) Partial Grant of Exemption No. 23553A, Regulatory Docket No. FAA-2024-2049 (July 17, 2026) (copy enclosed as Exhibit 1); and (2) Surveillance for Charitable Medical Flight Exemptions, Notice No. N 8900.786 (Aug. 12, 2026) (copy enclosed as Exhibit 2). Each Petitioner has a substantial interest in the orders identified above. Wings of Mercy, Inc. has its principal place of business in Zeeland, Michigan within this Circuit.

DATED: September 10, 2026

Respectfully Submitted,

/s/ Eric Heigis

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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing documents on September 10, 2026, by First Class Mail to the following in accordance with Fed. R. App. P. 25:

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/s/ Eric Heigis
ERIC HEIGIS

Exhibit 1

U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety

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In the matter of the petition of

WINGS OF MERCY DBA WINGS OF MERCY EAST MICHIGAN, INC. AND WINGS OF MINNESOTA, INC.

For an exemption from §§ 119.1, 61.113(a) and 61.113(c) of Title 14, Code of Federal Regulations

Exemption No. 23553A
Regulatory Docket No. FAA-2024-2049

PARTIAL GRANT OF EXEMPTION

By letter dated September 9, 2025, Mr. Fred Honore, President of Wings of Mercy, Inc. dba Mercy East Michigan, Inc. and Wings of Minnesota, Inc. (WOM), 100 South Pine Suite 393, Zeeland, MI 49464 petitioned the Federal Aviation Administration (FAA) on behalf of WOM for a reconsideration of a grant of exemption from § 119.1, 61.113(a), and 61.113(c) of Title 14, Code of Federal Regulations (14 CFR). The proposed exemption would allow Wings of Mercy volunteer pilots acting in command of a flight operation to provide charitable transportation to accept and receive reimbursement for fuel costs and airport fees and amend conditions and limitations found in Exemption No. 23553. WOM asked that the FAA reconsider the exemption's conditions and limitations.

Petition for Exemption

The petitioner supports its request with the following information:

Wings of Mercy (WOM) supports its request with the following information:

The petitioner states that certain conditions and limitations of the exemption are largely impractical and make fuel reimbursement nearly impossible for most volunteer pilots. The petitioner states that specific requirements, such as the need for a second-class medical certificate and restrictions on flying to airports without precision approaches, have placed untenable burdens on the network.

The petitioner states that the prohibition of fuel reimbursement has severely limited the network of volunteer pilots. The petitioner states that without fuel reimbursement, many of their pilots are unable to offer their services, forcing the petitioner to limit the number of flights they can conduct. The petitioner states that this is a tragic situation, as the petitioner has willing donors ready to cover these costs, but the petitioner is prevented from doing so due to the current restrictions imposed by the FAA.

The petitioner states that the prohibition of fuel reimbursement appears to be based on concerns about the safety of charitable medical flights, or the public's perception of safety. The petitioner states that it is important to clarify that fuel reimbursement, in and of itself, has no practical impact on the safety or perception of safety of a flight. The petitioner states that under current FAA guidelines, a private pilot with 40 hours of flying experience can legally conduct a charitable medical flight under minimum conditions, as long as they do not accept fuel reimbursement. The petitioner states that in contrast, an ATP-rated pilot with 10,000 hours of flight time is prohibited from conducting the same flight if they accept reimbursement. The petitioner states that this restriction is counterproductive to safety, and as it stands, in order to fulfil the demands for flights, the petitioner may need to reduce their flight experience standards to attract more pilots who do not require fuel reimbursement, which the petitioner states is the exact opposite result that the FAA intended with the prohibition of fuel reimbursement.

The petitioner states that Section 821 of the FAA Modernization and Reform Act of 2012 provides clear guidelines that limit the FAA's authority over volunteer pilots conducting charitable medical flights. The petitioner states that the Act permits the FAA to impose standards related to "training and flight hours", but does not authorize unnecessary, burdensome requirements. The petitioner states that the recent exemption granted to the petitioner goes far beyond the intent of the legislation, imposing requirements such as a second-class medical certificate, restrictions on flying to airports without precision approaches, and additional vertical and distance requirements for instrument approaches. The petitioner states that there are several conditions within the exemption that the petitioner believes go beyond the scope of the "training and flight hours" limitation established by Section 821, but the petitioner finds them workable, and accordingly, the petitioner states that they do not intend to appeal them. The petitioner stated that they urge the FAA to review the exemption and limit its regulatory scope to only those areas specifically addressed by Section 821 and remove any excessive and unnecessary requirements that hinder the petitioner's ability to provide these critical services.

The petitioner provided the following list of exemption conditions and limitations in Exemption No. 23553 that the petitioner states are causing an undue burden on their operation:

Condition and Limitation No. 4(b):

<u>NOTE:</u> Upon review, the FAA has determined that the petitioner referenced the current text of Condition and Limitation 4. (b)., not Condition and Limitation No. 4(a). as stated in their petition for exemption amendment. Therefore, the FAA believes that the petitioner is petitioning to amend Condition and Limitation No. 4(b). Instead of Condition and Limitation No. 4(a). Further, the FAA has determined that the petitioner's quote of the current text of Condition and Limitation No. 4(b) was inaccurate. The petitioner's current Condition and Limitation No. 4(b).

within their exemption grant letter states, "Documentation showing all Wings of Mercy pilots' flight experience, airman certificate information, and currency of FAA medical certificates."

The petitioner stated that they were referencing the current language of Condition and Limitation No. 4(b). by stating, "Documentation showing all (emphasis added) Wings of Mercy pilots' flight experience, airman certification information, and currency of FAA medical experience."

The petitioner stated the following concern: "The requirement for WOM to retain all of the pilots' flight experience and airman certificate information and currency would require an undue amount of administrative burden on both the PIC and WOM. Full compliance would necessitate the submission and storage of complete pilot logbooks prior to conducting each flight."

The petitioner stated the following as their proposed alternate equivalent level of safety: "WOM will retain documentation showing the PIC's airman certificate and the FAA medical certificate (or [BasicMed] equivalent). The PIC will self-certify, using a Pre-Flight Certification Form or an equivalent form thereof, that they meet the minimum requirements as outlined in this exemption along with the currency requirements as promulgated by part 91 prior to conducting each flight. This approach preserves the desired PIC accountability while reducing unnecessary administrative burden on the organization. Wings of Mercy will retain the Pilot Preflight Certification form for 24 months following the flight. Retention of the supporting information provided by the Pilot as required under the exemption is the responsibility of the PIC who is already required to maintain documentation demonstrating currency as mandated by FAA regulations. In other words, this alternative will not compromise safety as, all documentation required by the exemption will remain readily accessible to any FAA representative but will be held by the PIC rather than WOM."

Condition and Limitation No. 5(e):

The petitioner stated that they were referencing the current language of Condition and Limitation No. 5(e). by stating, "All pilots operating under the terms of this exemption must possess…a second-class medical certificate (per §§ 61.2 and 61.23(a)(2)(ii))".

The petitioner stated the following concern: "The vast majority of our volunteer pilots do not maintain a second-class medical certificate. This requirement severely limits the number of pilots that can conduct flights under this exemption, impacting WOM's ability to carry out our missions."

The petitioner stated the following as their proposed alternate equivalent level of safety: "In lieu of a second-class medical certificate, a pilot may operate under the terms of this exemption if he/she possesses a FAA Medical under FAR 67 Subpart D or FAR 68 (commonly referred to as BasicMed) and conducts the flight with a second pilot, who is legally qualified and meets the minimum certification, medical and currency standards as promulgated by the FARs necessary to conduct the flight. Having a second qualified pilot provides an equivalent, if not a greater level of safety, as compared to a single pilot with a second-class medical. Furthermore, there are two existing examples in the FAR's that allow reimbursement without the need for a Second-Class

Medical. Namely, FAR 91.146 and 91.321. Therefore, the requirement for two pilots coupled with other examples in the FAR's provide a reasonable equivalent level of safety."

Condition and Limitation No. 5(g):

The petitioner stated that they were referencing the current language of Condition and Limitation 5(g) by stating, "All pilots operating under the terms of this exemption must, within the preceding 12 calendar months, (receive) an instrument proficiency check (IPC) meeting the requirements of § 61.57(d)."

The petitioner stated the following concern: "A large portion of our volunteer pilots do not receive annual IPC's as they are not required under Part 91. Thus, this requirement severely limits the number of pilots that can conduct flights under this exemption, impacting WOM's ability to carry out our missions."

The petitioner stated the following as their proposed equivalent level of safety: "In lieu of requiring an annual IPC, a pilot may operate under the terms of this exemption if 1) he/she possesses the instrument experience requirement outlined in § 61.57(c), 2) receives an IPC within the preceding 24 months meeting the requirements of § 61.57(d). The IPC must be conducted in accordance with the Instrument Rating – Airplane Airman Certification Standards, and 3) the flight is conducted with a second pilot, who is legally qualified and meets the minimum certification, medical and currency standards as promulgated by the FARs necessary to conduct the flight. Having a second qualified pilot provides an equivalent, if not greater level of safety, as compared to a single pilot."

Condition and Limitation No. 5(i):

The petitioner stated that they were referencing the current language of Condition and Limitation 5(g) by stating, "For all (emphasis added) operations under this exemption, the pilot must meet the recent flight experience requirements for night operations (per § 61.57(b)) in an aircraft of the same category, class, and type (if a type rating is required)."

The petitioner stated the following concern: "A large portion of our volunteer pilots do not maintain night currency. This requirement severely limits the pool of pilots that can conduct flights under this exemption."

The petitioner stated the following as their proposed alternate equivalent level of safety: "Pilots not meeting the flight experience requirements for night operations per § 61.57(b) will be restricted to daytime operations. If a flight initially scheduled as a daytime operation is delayed beyond civil twilight for an unforeseen reason, WOM will have protocols in place to arrange alternative flights, hotel accommodations or alternative forms of transportation. Simply put, safety will not be compromised as a pilot will not be permitted to conduct a flight at night without the required flight experience and WOM will implement procedures to reduce any implied pressure that can be caused by unforeseen delays."

Condition and Limitation No. 11(b):

The petitioner stated that they were referencing the current language of Conditions & Limitations 11(b) by stating, "For flights in instrument meteorological conditions (IMC), each pilot may only use airports that have functioning, published, precision approach procedures."

The petitioner stated the following concern: "To minimize the ground transportation required for our patients, many WOM flights are conducted out of smaller airfields who do not have precision approaches yet have GPS procedures and, in many cases, LPV or LNAV+V. As GPS approaches become more prevalent, the access to ILS approaches, which are the only remaining precision approach available for most general aviation airplanes, have been reduced."

The petitioner stated the following as their proposed alternate equivalent level of safety: "For flights into IMC, each pilot may only use airports that have a functioning published Instrument Approach Procedure. If an alternate airport is required by FAR 91.169(c)(i), the alternate airport must have a precision approach or APV approach. This will not compromise safety as APV approaches have, for all practical applications, the same level of lateral and vertical guidance as an ILS. Furthermore, non-precision approaches are widely used throughout the National Airspace System and have a history of safe operations, especially when there is a planned alternate with a precision or APV approach. Part 91, 121 or 135 operators do not require a Precision approach at an alternate airport. In addition, Wings of Mercy is adding 100' and ½ mile to all IFR approach minimums. Combined, all of these considerations meet or exceed Air Carrier standards and thus provide an equivalent level of safety.

Condition and Limitation No. 11(d):

The petitioner stated that they were referencing the current language of Condition and Limitation 11(d) by stating, "Each pilot must add 50 percent to pilot operating handbook (POH) runway length performance for obstacle clearance on takeoff and landing under ambient conditions."

The petitioner stated the following concern: "To minimize the ground transportation requirements for our patients, WOM conducts a number of operations out of remote airports with short runways. Requiring a fifty percent buffer to runway length performance will have significant limitations on the number of airports we can operate out of (e.g., Ann Arbor, Ottawa Executive)."

The petitioner stated the following as their proposed alternate equivalent level of safety: "Each pilot of a piston engine aircraft or single engine turboprop aircraft must add 20% to the pilot operating handbook (POH) runway length performance for obstacle clearance on takeoff and landing under ambient conditions if the takeoff or landing is conducted during the day, or 40% if the takeoff or landing is conducted at night. Multi-engine turboprops and Jets must utilize the manufacturer's charts in their respective POH or AFM to calculate engine out takeoff runway requirement over an obstacle. This reduction in the buffer will have a minimal impact on safety. In fact, the FAA recommends a 15% safety margin. This safety margin allows for obstacle clearance buffers and accounts for the variability of conditions in the vast airport system. By exceeding manufacturer and FAA recommendations this proposed condition is a reasonable equivalent level of safety."

Condition and Limitation No. 13(b):

The petitioner stated that they were referencing the current language of Condition and Limitation 13(b) by stating, "Wings of Mercy must develop and implement an initial pilot ground training program that includes…[the] principals and methods for determining weight and balance and runway limitation for takeoff and landings".

The petitioner stated the following concern: "This requirement is excessive as these topics are comprehensively covered during the pilot certification process. Furthermore, this type of training should be conducted by a certified flight instructor who has the requisite training and experience on how to properly teach these principals, especially as it pertains to the unique models outlined in the Pilot Operating Handbook for each aircraft being flown. WOM is not properly equipped to conduct this training."

The petitioner stated the following as their proposed alternate equivalent level of safety: "The training and testing required under existing part 61 certification adequately covers weight and balance, as well as takeoff and landing performance. Relying on FAA-certified instructors provides a more consistent and rigorous level of safety than VPO-provided training. Furthermore, WOM will require the PIC to certify in a Preflight Certification form that they have performed and confirmed that the weight and balance and runway limitation calculations are within the operating specifications outlined in the Pilot Operating Handbook. This Preflight certification form will be retained for 24 months following a flight. Lastly, WOM will train PICs on how to properly interpret WOM flight manifests, including weights of passengers and baggage, along with protocols on how to handle situations where the actual passengers and baggage appear to be different than what was itemized on the manifest. This training will be included within the initial onboarding syllabus along with any recurrent training. Thus, an equivalent level of safety is established."

Condition and Limitation No. 16.:

The petitioner stated that they were referencing the current language of Condition and Limitation No. 16 by stating, "Wings of Mercy must maintain a copy of the aircraft logbook entry for the most recent annual inspection of any aircraft used to conduct flights under this exemption."

The petitioner stated the following concern: "This requirement puts undo administrative burden on the pilot and WOM."

The petitioner stated the following as their proposed alternate equivalent level of safety: "The PIC will be responsible for maintaining and providing, upon request, a copy of the logbook entry for the most recent annual inspection. Prior to flight, the PIC will certify to WOM, utilizing the Preflight Certification form, that all required maintenance inspections have been completed. This approach preserves accountability while reducing unnecessary administrative burden on the organization. This preflight certification form will be retained for 24 months following flight. An equivalent level of safety is established as the information required under the exemption will still be maintained; it will simply be maintained by the pilot, not WOM."

The petitioner stated one additional concern with their exemption grant letter: "In the Petition for Exemption field by WOM on July 18, 2024, WOM filed on behalf of Wings of Mercy, Inc., and its affiliates, Wings of Mercy East Michigan, Inc. and Wings of Mercy Minnesota, Inc. The Exemption received from the FAA dated March 14, 2025, only granted relief to Wings of Mercy, Inc." The petitioner further states, "Each organization is a unique legal entity that is affiliated via licensing agreements with Wings of Mercy, Inc. A condition of that licensing agreement is that the affiliated entities utilize the same operational guidelines as promulgated by Wings of Mercy, Inc. Therefore, each affiliated entity will be subject to the same terms and conditions outlined in the exemption.."

Federal Register Notice

A summary of the petition was published in the *Federal Register* on September 29, 2025 (90 FR 46735).[1] One comment was received in favor of granting the amendments to the prior granted exemption. The commenter stated they support "WOM's request in its entirety."

The FAA's Analysis

The FAA has fully considered the petition and the comments received and it finds that the circumstances presented by the petitioner justify granting only some of the amendments requested to the conditions and limitations provided in Exemption No. 23553. The FAA also finds that the remaining conditions and limitations the petitioner asks be amended are necessary to ensure an equivalent level of safety as that provided under 14 CFR §§ 119.1, 61.113(a), and 61.113(c). Moreover, reducing the level of safety by amending all the conditions and limitations petitioner requested would also not be in the public interest.

In response to the petitioner's argument that several of the conditions and limitations go beyond the scope of Section 821 of the FAA Modernization and Reform Act of 2012, the FAA has determined that the conditions and limitations in Exemption No. 23553 are consistent with the congressional mandate of Section 821 and the Administrator's authority over aviation safety under 49 U.S.C. § 40103. Section 821 provides in relevant part that "[t]he Administrator may impose minimum standards with respect to training and flight hours . . . including mandating that the pilot in command of such aircraft hold an instrument rating and be current and qualified. . ." While Congress specifically addressed areas where the Administrator may impose minimum standards when allowing an aircraft owner or operator to accept reimbursement, the provision did not use exclusive language or otherwise limit the Administrator's other statutory authorities to ensure safety in aviation. As the FAA announced in 2013, the FAA would implement Section 821 through the exemption process. *Policy Clarification on Charitable Medical Flights*, 78 FR

[1] The original Federal Register notice posted to Docket No. FAA-2025-2694 was moved to Docket No. FAA-2024-2049 after the notice closed.

12233 (Feb. 22, 2013). The exemption process requires that petitioners show operations under the exemption would not adversely affect safety and that granting the exemption is in the public interest. The conditions and limitations issued with Exemption No. 23553 are necessary to ensure operations under the exemption do not adversely affect safety.

Regarding the petitioner's request that the relief apply to its affiliated organizations, the FAA is granting partial relief only to Wings of Mercy, Inc., the petitioner for relief. Any separate affiliated legal entity seeking similar relief must petition for relief on behalf of their own organization.

The reasons for granting or denying the requested amendments are provided below.

<u>Granted Amendment Requests</u>

Condition and Limitation No. 11(b):

As stated in Condition and Limitation No. 11(b), "All pilots operating under this exemption must comply with the following requirements: For flights in instrument meteorological conditions (IMC), each pilot may only use airports that have functioning, published, precision approach procedures." This condition and limitation is included to ensure no adverse effect on safety by preventing WOM's pilots from only having to rely on non-precision approaches for landing in IMC conditions, arguably the highest risk environment for a general aviation pilot.

The FAA has considered the petitioner's request and has determined that modifying Condition and Limitation No. 11(b) by requiring that "each pilot may only use airports that have at least one functioning, published approach procedure with vertical guidance" would provide an equivalent level of safety compared to complying with the existing regulations. For purpose of this exemption, the FAA has determined that a functioning, published approach procedure with vertical guidance is functionally equivalent and, therefore, would provide an equivalent level of safety to that offered by an ILS precision approach. Specifically, the FAA has determined that a functioning, published approach procedure with vertical guidance offers similar approach minimums to an ILS precision approach and would continue to ensure that WOM's pilots would not have to rely on non-precision approaches for landing in IMC conditions. This change will allow pilots operating under this exemption to utilize airports served by Wide Area Augmentation System (WAAS) Localizer Performance with Vertical guidance (LPV) Area Navigation (RNAV) instrument approach procedures. Additionally, this will allow pilots more flexibility in choosing the airport destination while maintaining the level of operational safety afforded by a vertically guided approach. The request to amend Condition and Limitation No. 11(b) is hereby granted.

<u>New Conditions and Limitations</u>

To clarify under what circumstances the requirements of this Condition and Limitation No. 11 apply, the FAA is adding Condition and Limitation No. 11(h) to clarify that these requirements apply only to legs with a CMF client (patient or caregiver) on board. Upon review, the FAA has determined that it is in the interest of the general public that volunteer pilots be able to reposition an aircraft from a location that does not meet the specific criteria listed in Condition and Limitation No. 11(h) and thus be able to be reimbursed for these repositioning legs. Generally, the conditions and limitations of this exemption ensure that an equivalent level of safety for the flying public is maintained when compensation is provided for transportation. Specifically, the conditions and limitations set forth in Condition and Limitation No. 11(a)-(g), as previously indicated, are intended to ensure that the equivalent level of safety expected by exemption is maintained. As CMF clients are generally not onboard the aircraft during repositioning flights, the FAA has determined that any risk posed by non-compliance with Condition and Limitation No. 11(a)-(g) is mitigated by not allowing any additional CMF client onboard, and that safety would not be adversely affected by this amendment. Furthermore, it is in the interest of the general public that volunteer pilots be able to reposition an aircraft from a location that does not meet the specific criteria listed in Condition and Limitation No. 11(h) and thus be able to be reimbursed for these repositioning legs.

<u>Denied Amendment Requests</u>

Condition and Limitation No. 4(b):

Condition and Limitation No. 4(b) states "Wings of Mercy must ensure the following items are available to any representative of the FAA Administrator, upon request: Documents showing all Wings of Mercy pilots' flight experience, airman certificate information, and currency of FAA medical certificates." This condition and limitation is in place because as the exemption holder WOM is considered the operator of these flights. The FAA requires the operator of these flights to retain copies of these records to ensure that a pilot assigned to any flight is compliant with the exemption's conditions and limitations. Condition and Limitation No. 4(b) also requires petitioner to make the records available for inspection upon request from the FAA. This allows the FAA to ensure that WOM's own policies and procedures regarding the verification of compliance by the pilot are being followed. Therefore, requiring records retention by WOM via this condition and limitation ensures that at least an equivalent level of safety to the regulations from which relief was granted is maintained.

Petitioner requests to amend Condition and Limitation 4(b) to require WOM only to retain documentation showing the PIC's airman certificate and FAA medical certificate. Petitioner's requested amendment would also permit the PIC to self-certify using a Pre-flight Certification form that they meet the minimum requirements outlined in the exemption and currency requirements of part 91 prior to conducting the flight. According to petitioner, this preserves pilot accountability and reduces administrative burden and paperwork on WOM. Under this proposal, WOM states they would retain the Pilot Preflight certification form for 24 months and the remainder of the documentation would be required to be maintained by the pilot. However, upon review the FAA determined that petitioner's requested amendment would not ensure that an equivalent level of safety is maintained. Specifically, while petitioner's approach might be more convenient and may still allow FAA access to records, it does not demonstrate that replacing organization-held and verified records with unverified self-certification and pilot held records achieves the same assurance of compliance with the exemption's conditions and limitations or ensure that in the event of an accident the sole copy of a pilot's records were not destroyed preventing FAA or NTSB from verifying WOM's, and the pilot's compliance with this exemption. Therefore, for the reasons stated above, amending the underlying exemption would not be an equivalent level of safety to that of the existing regulations. Therefore, petitioner's request to amend Condition and Limitation No. 4(b) is hereby denied.

Condition and Limitation No. 5(e):

As stated in Condition and Limitation No. 5(e), "All pilots operating under the terms of this exemption must possess the following certificates, qualifications, and aeronautical experience – […] A second-class medical certificate (per §§ 61.2 and 61.23(a)(2)(ii))." This condition and limitation is in place because the second-class medical certificate provides a higher level of safety for the flying public due to the increased frequency of the examination and the ability to detect and mitigate a medical condition that could lead to pilot incapacitation.

As stated above, the petitioner requests to amend Condition and Limitation No. 5(e) to allow private pilots to operate CMFs with either a third-class medical certificate or BasicMed, with the addition of a second pilot onboard the aircraft.

Medical certification requirements are established based on the type and risk of the operation being conducted rather than the privileges of the pilot certificate being exercised. The FAA has established a longstanding requirement for pilots operating aircraft for compensation or hire to hold at least a second-class medical certificate. See § 61.23(a)(2)(ii). The higher-level medical certificate ensures the public a higher standard of safety for pilots operating in the National Airspace System (NAS). Second-class medical certificates have more frequent examinations, higher vision standards, and in some cases, higher thresholds to obtain a special issuance for certain conditions. Requiring a second pilot in an aircraft that does not require a second pilot does not completely mitigate medical risk, as some medical conditions result in nonobvious impairment.

Furthermore, §§ 91.146 and 91.321 [2] are not proper analogues because those rules apply to different, narrowly-defined operations, and the petitioner failed to demonstrate that WOM's operations are comparable from a risk standpoint. Overall, the FAA finds that while the petitioner's statement offers assurances, it does not provide real safety analysis, data, or hazard assessment that demonstrates that the risks mitigated by the current Condition and Limitation No. 5(e) would still be mitigated. Moreover, BasicMed, by statute, prohibits pilots from operating for compensation or hire beyond the constraints of § 61.113(b)-(h). As WOM's current exemption does not apply to the BasicMed regulatory provisions, the FAA would not consider this as an equivalent level of safety to the second-class medical certificate.

Therefore, petitioner's request to amend Condition and Limitation No. 5(e) is hereby denied.

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[2] 14 CFR 91.146, Passenger-carrying flights for the benefit of a charitable, nonprofit, or community event; 14 CFR 91.321, Carriage of candidates in elections.

Condition and Limitation No. 5(g):

As stated in Condition and Limitation No. 5(g), "All pilots operating under the terms of this exemption must possess the following certificates, qualifications, and aeronautical experience – [..] Within the preceding 12 calendar months, an instrument proficiency check (IPC) meeting the requirements of 61.57(d)." This condition and limitation was implemented because an annual IPC was determined to be equivalent to the currency requirements of an operator issued a certificate under § 119.1 and because requiring WOM's pilot to obtain an IPC every 12 calendar months ensures that these pilots have demonstrated specific proficiency required by the standards of the Instrument Rating Airman Certification Standards (ACS. Furthermore, basic instrument currency requirements as defined in § 61.57 (c) are not sufficient to ensure the higher safety standard required of pilots conducting CMFs for compensation because there is no standard of performance to evaluate under those currency requirements. For example, § 61.57(c) merely requires that a given number of instrument approaches be logged within 6 calendar months. The FAA has determined that private pilots conducting operations under this exemption must have their skills evaluated to a specific standard by a third party on an annual basis to ensure that a higher level of safety for the flying public is maintained when compensation is provided for transportation.

Petitioner requests to amend Condition and Limitation No. 5(g) by removing the requirement that their pilots obtain an annual instrument proficiency check (IPC). Instead, petitioner proposes to utilize the currency requirements of § 61.57(c)(1) in addition to obtaining an IPC every 24 calendar months as well as the addition of a second pilot onboard. Upon review of petitioner's request, the FAA has determined that petitioner's proposed amendment would not provide for an equivalent level of safety to the regulations because each pilot would not be evaluated by a third party, in this case a CFI during an IPC, to evaluate knowledge skills and abilities as outlined in the Instrument Rating ACS. The FAA has determined that a 24-calendar month interval presents an unacceptable risk from an instrument proficiency standpoint in that a pilot's instrument skills and abilities could degrade to an unacceptable level without more frequent evaluations. For example, if a pilot only flew a minimal amount of flights in VFR weather conditions, and only utilized WOM's proposed currency requirements, this would create a significant safety risk for CMFs where the operational pressure to complete a flight during potential marginal weather conditions could place a pilot in a situation in which they are not proficient to handle safely. Moreover, the addition of a second pilot into an aircraft operation not requiring a second crewmember does not result in an equivalent level of safety to the regulations from which relief was granted because the pilots conducting the CMF operations may not be trained or evaluated to operate in a multi-crew environment and there is not a standard level of certification of a second pilot's ability to operate an aircraft from a nonstandard pilot station.[3]

[3] The FAA notes that there is no prohibition in this exemption on having a pilot rated *passenger* on board a CMF, and the FAA recognizes the safety benefit of having a pilot rated passenger on board the aircraft in the event of an emergency. However, ultimately, this pilot is not considered a required crewmember for this operation unless required by the type certificate of the aircraft.

Therefore, the petitioner's request to amend Condition and Limitation No. 5(g) is hereby denied.

Condition and Limitation No. 5(i):

Condition and Limitation No. 5(i) states "For all operations under this exemption, the pilot must meet the recent flight experience requirements for night operations (per § 61.57(b)) in an aircraft of the same category, class, and type (if a type rating is required)." This condition and limitation is in place to ensure an equivalent level of safety to that of an operator issued a certificate under § 119.1, and that pilots conducting night operations have the appropriate skills and training necessary to safely conduct night operations. Specifically, this condition and limitation ensures that WOM's pilots are current to operate during night conditions if the need were to arise. For example, a pilot may be faced with a marginal weather situation at the destination airport prior to sunset. This could lead to the pilot departing during those conditions to ensure completion of the flight, whereas if the weather conditions were forecasted to be clear later in the day or evening, the flight might then be completed in more favorable weather conditions and thus a lower level of operational risk.

As previously stated above, the petitioner requested to amend Condition and Limitation No. 5(i), by removing the requirement to have their pilots be current for night operations. Upon review, the FAA finds that WOM's proposal would add additional risk into their operation by forcing their pilots to operate only during daylight hours. While the FAA recognizes that WOM could make a business decision to conduct operations only during daylight hours, night currency for WOM's pilots would be necessary to minimize the risk of pilots making unsafe decisions merely to complete flights during daylight hours. Maintaining currency for night operations ensures that a pilot is equipped in experience and training to conduct the operations at night if circumstances or conditions should require it.[4] This condition and limitation is in place to ensure an equivalent level of safety to that of an operator issued a certificate under § 119.1. For the reasons discussed above, petitioner's request to amend Condition and Limitation No. 5(i) is hereby denied.

Condition and Limitation No. 11(d):

Condition and Limitation No. 11(d) states, "All pilots operating under this exemption must comply with the following requirements. Each pilot must add 50% to pilot operating handbook (POH) runway length performance for obstacle clearance on takeoff and landing under ambient conditions." This condition and limitation is in place to ensure that sufficient runway lengths are being used for these operations due to the increased risk of takeoff and landing accidents. In order to mitigate risk associated with takeoff and landing performance, the additional 50% increase to takeoff and landing performance requirements provides the equivalent level of safety to that required by operations requiring an operator certificate issued under 119.1.

[4] The FAA also notes that WOM contradicts itself in its rationale for the requested amendment. Specifically, WOM states that the purpose of these CMFs is to alleviate the need for alternate forms of transportation, yet they also state that alternate means of transport can be used in the event a flight must be cancelled due to night conditions.

As stated above in the petitioners request to amend Condition and Limitation No. 11(d), petitioner contends that by requiring a 50% increase to runway performance calculations the number of airports available to WOM to operate from is limited. However, upon review, the FAA determined that if the FAA were to grant WOM's request to lower the requirement to 20%, this would create an unacceptable level of risk as private pilots have not been evaluated and certificated to a higher standard of skill regarding landing and takeoff precision. For example, an aircraft with a calculated 1,500-foot-long landing distance would be required to operate out of an airport with at least a 2,250-foot-long runway. Under WOM's proposal that would be reduced to an 1,800-foot-long runway. According to the ACS, a private pilot is required to demonstrate their ability to touchdown within 400 feet of their intended landing point as opposed to 200 feet for a commercial pilot. The margin of safety in this example would be 300 feet, which is less than the demonstrated 400-foot variance that a private pilot is allowed to demonstrate.

Therefore, the request to amend Condition and Limitation No. 11(d) is hereby denied

Condition and Limitation No. 13(b):

As previously stated, the petitioner requested to amend Condition and Limitation No. 13(b), to allow relief from the requirements developing and implementing an initial pilot ground training program. WOM believes that the topics that are required to be covered are adequately covered during part 61 certification and currency activities.

Condition and Limitation No. 13(b) states "Wings of Mercy must develop and implement an initial pilot ground training program that includes the following: Principles and methods for determining weight and balance, and runway limitations for takeoff and landings." WOM's proposal is inadequate in that the currency requirements of the Flight Review required by § 61.56 do not have a level of specificity required to provide an equivalent level of safety for an operation that normally would require a certificate issued under § 119.1. Specifically, the items listed in Condition and Limitation No. 13(b) are not required to be covered during a flight review, in that it is entirely up to the discretion of the authorized instructor as to what procedures and maneuvers shall be reviewed during that training activity. The FAA has determined that the operations covered by this exemption warrant a thorough review of the determination of weight and balance as well as takeoff and landing performance of the aircraft, as these are critical elements to safe operation of these flights that must be reviewed on an annual basis as required by Condition and Limitation No. 14.

This condition and limitation is in place because WOM, as the operator of these flights, must ensure a standard minimum level of training and qualification for each of its pilots. These areas of emphasis are specifically required due to the unique nature of the operations under this exemption such as unfamiliar airports and unfamiliar passenger and baggage considerations.

The FAA notes that while WOM may not be equipped to provide training, WOM is ultimately responsible for implementing and ensuring that their pilots receive training that is appropriate to meet the conditions and limitations listed. The basic training and currency requirements for a private pilot alone are insufficient to ensure an equivalent level of safety for operations permitted under this exemption. For example, the FAA expects pilots operating under this exemption to be trained and evaluated on an annual basis on weight and balance and landing calculations that are not specifically required by the currency requirements of§ 61.56. This condition and limitation is in place to ensure an equivalent level of safety to that of an operator issued a certificate under § 119.1.

Therefore, the petitioner's request to amend Condition and Limitation No. 13(b) is hereby denied.

Conditions & Limitation No. 16:

As previously stated above, the petitioner requested to amend Condition and Limitation No. 16 stating that due to administrative burdens, they believe that it is an equivalent level of safety for the PIC of the aircraft to maintain a copy of the aircraft annual inspection logbook entry.

Condition and Limitation No. 16 states "Wings of Mercy must maintain a copy of the aircraft logbook entry for the most recent annual inspection of any aircraft used to conduct flights under this exemption." This condition and limitation is in place because WOM, as the operator of these flights, is ultimately responsible for ensuring and demonstrating compliance with this exemption. As with the pilot records retention requirements discussed above, it is not feasible for the FAA to contact each individual pilot or mechanic to obtain copies of aircraft logbooks in order to ensure that WOM is complying with the conditions and limitations of this exemption. In addition, if a pilot elected to keep these records in the aircraft with him/her in the event of an aircraft accident, the documentation could potentially be destroyed. Furthermore, it is intended that the petitioner ensure that the aircraft annual inspections are valid prior to the flight being conducted.

Therefore, amending this condition and limitation would not provide for an equivalent level of safety to that of an operator issued a certificate under § 119.1, and petitioner's request for amendment is denied.

The FAA's Decision

In consideration of the foregoing, I find that amending Condition and Limitation No. 11(b) is warranted and that it is necessary to deny amendments to Conditions and Limitations Nos. 4(b), 5(e), 5(g), 5(i), 11(d), 13(b) and 16 to ensure Exemption No. 23553 does not adversely affect safety and remain in the public interest. The requested amendment for changes to Condition and Limitation No. 11(b) is granted. The requested amendment to Conditions and Limitations Nos. 4(b), 5(e), 5(g), 5(i), 11(d), 13(b) and 16 is denied. Therefore, pursuant to the authority contained in 49 U.S.C. §§ 106(f), 40113, 44701, delegated to me by the Administrator, Wings of Mercy is granted an exemption from 14 CFR §§ 119.1, 61.113(a) and 61.113(c) to the extent necessary to allow WOM volunteer pilots acting in command of a flight operation to provide charitable transportation to accept and receive reimbursement for fuel costs and airport fees, subject to the conditions and limitations listed below.

Conditions and Limitations

1. The following definitions apply when these terms are used in this exemption:

   a. Charitable Medical Flight (CMF): A flight operation to provide transportation for an individual or organ for medical purposes (and for other associated individuals), if the aircraft owner or operator has volunteered to provide such transportation.

   b. Volunteer Pilot Organization (VPO): An organization:

      i. Described in section 501(c)(3) of the Internal Revenue Code of 1986 and exempt from taxation under section 501(a) of such Code; and

      ii. Organized for the primary purpose of providing, arranging, or otherwise fostering charitable medical transportation.

2. Before exercising the relief granted by this exemption, Wings of Mercy must ensure it meets the definition of a VPO and that the flight meets the definition of a CMF, as specified in Condition and Limitation No. 1.

3. This exemption may be exercised only for CMFs conducted by Wings of Mercy. A CMF includes flights that are intended to reposition the aircraft to the client pick-up location, as well as reposition the aircraft following the client drop-off. Any repositioning flight must be from the aircraft home base to and from the point of client pick-up/drop-off location by the most practical route.

4. Wings of Mercy must ensure the following items are available to any representative of the FAA Administrator, upon request:

   a. A detailed description of Wings of Mercy's process for verification of each pilot's qualification and training. This process must include a means to verify each pilot's qualifications to act as pilot-in-command (PIC) prior to each flight;

   b. Documentation showing all Wings of Mercy pilots' flight experience, airman certificate information, and currency of FAA medical certificates.

   c. Documentation from each pilot showing that at the time he/she accepts a CMF under this exemption, he/she meets all minimum standards and appropriate currency requirements established by Wings of Mercy, part 61, and all Conditions and Limitations of this exemption; and

   d. Documentation of each flight and reimbursement containing the following information, at a minimum:

i. Name and pilot certificate number of the PIC;

ii. Name and identifier of the departure and arrival airports;

iii. Name of all occupants of the airplane excluding the PIC;

iv. Date and time of departure and arrival; and

v. Amount of the fuel reimbursement.

e. All the documentation required under Condition and Limitation No. 4 must be maintained by Wings of Mercy for a minimum of 24 calendar months.

5. All pilots operating under the terms of this exemption must possess the following certificates, qualifications, and aeronautical experience –

a. An instrument rating or Airline Transport Pilot (ATP) certificate that is appropriate to the aircraft being flown;

b. A minimum total flight time of 500 hours, with no less than 400 hours as PIC, and a minimum of 50 hours in the specific make and model of the aircraft being flown;

c. A minimum of 50 hours as PIC must have been logged within the preceding 12 calendar months prior to the month of the flight;

d. A minimum of 12 hours flown and logged within the preceding 3 calendar months prior to the month of flight. In lieu of this requirement, a pilot may have logged 2 hours of flight training with a certificated flight instructor within the preceding 3 calendar months prior to the month of the flight;

e. A second-class medical certificate (per §§ 61.2 and 61.23(a)(2)(ii));

f. A current flight review (per § 61.56(a)) in the same aircraft category, class, and type (if a type rating is required) being flown;

g. Within the preceding 12 calendar months, an instrument proficiency check (IPC) meeting the requirements of § 61.57(d). The IPC must be conducted in accordance with the Instrument Rating — Airplane Airman Certification Standards. This requirement can be substituted by an FAA practical test for an ATP certificate or instrument rating;

h. In addition to meeting the IPC requirement of § 61.57(d) as specified in Condition and Limitation No. 5(g), the pilot must meet the recent flight experience requirements of § 61.57(c), in the same aircraft category, class, and type (if a type rating is required) being flown; and

i. For all operations under this exemption, the pilot must meet the recent flight experience requirements for night operations (per § 61.57(b)) in an aircraft of the same category, class, and type (if a type rating is required).

6. All operations under this exemption must be in compliance with the following flight duty, rest, and flight time limitations (a duty day starts when the pilot arrives at the airport and begins preparation for the flight and terminates upon completion of the post-flight inspection of the aircraft):

    a. No pilot may fly more than 8 hours of flight time (per § 61.1) within any 24-consecutive-hour duty day period;

    b. No pilot may perform a duty day in excess of 12 consecutive hours; and

    c. Once the pilot has performed 12 consecutive hours of duty, the pilot must rest a period of at least 12 hours before conducting any other CMF.

7. Prior to each takeoff, the PIC must ensure that all occupants have been orally briefed on the following:

    a. The flight is being permitted under this grant of exemption and that the operator is not a certificated commercial operator;

    b. When, where, and under what conditions smoking is allowed;

    c. Use of safety belts, shoulder harnesses, and child restraint systems: when, where, and under what conditions it is necessary to fasten passenger safety belts and, if installed, shoulder harnesses;

    d. The placement of seat backs in an upright position before takeoff and landing;

    e. Location and means for opening the passenger entry door and emergency exits;

    f. Location of survival equipment;

    g. Use of normal and emergency oxygen installed; and

    h. Location and operation of fire extinguishers.

An FAA sample briefing document can be found in the July/August 2014 edition of the FAA Safety Briefing Magazine.[5]

8. Wings of Mercy must implement procedures to notify the passengers (or their legal guardians) who will be on the flight, that the flight operations are for charitable purposes and are not subject to the same FAA requirements as a commercial flight. These procedures must allow for the notification to be given as early as possible to the passengers (or their legal guardian). Such notification must also be provided to any individual who inquires about receiving or scheduling a CMF.

9. Each aircraft operated under this exemption must have a standard airworthiness certificate.

10. The aircraft must be maintained and inspected in accordance with 14 CFR part 91 Subpart E, 14 CFR part 43, or other inspection programs approved by the FAA.

11. All pilots operating under this exemption must comply with the following requirements:

    a) All flights operating under this exemption must activate an Instrument Flight Rules (IFR) flight plan. The earliest the flight plan may be cancelled is upon visual contact with the destination airport;

    b) For flights in instrument meteorological conditions (IMC), each pilot may only use airports that have at least one functioning, published approach procedure with vertical guidance;

    c) Each pilot must add 100 feet and ½ mile to all instrument approach minimums;

    d) Each pilot must add 50 percent to pilot operating handbook (POH) runway length performance for obstacle clearance on takeoff and landing under ambient conditions

    e) For IMC takeoff minimums, the PIC must ensure that the weather meets approach landing minimums with additional margin noted in Condition and Limitation No. 11(c) (Example: If the Baltimore-Washington International Airport minimums are 200/1/2, then the takeoff minimums will be at least 300 feet and 1 statute-mile visibility);

    f) Prior to each takeoff, the PIC must ensure that patients who may need the assistance of another person to exit the aircraft if an emergency occurs, have received a briefing as to the procedures to be followed if an evacuation occurs;

g) Each pilot will utilize and brief passengers about sterile cockpit procedures as defined in 14 CFR § 135.100; and

h) The requirements of Conditions and Limitations No.11 (a) through (g) apply only to flight legs with a charitable medical flight passenger (patient or caregiver) on board.

12. Wings of Mercy must develop and implement a preflight risk assessment tool. The tool must be completed by the PIC before each flight and must be transmitted to Wings of Mercy prior to takeoff for any flight operated under this exemption. The completed tool must be retained by Wings of Mercy for a minimum of 30 days. Wings of Mercy must identify a maximum score flight value, or other appropriate measures[6].

The FAA recognizes that any sample tool used to assess any potential safety risk during preflight planning should be modified to adequately address the risk for general aviation aircraft and Wings of Mercy's specific operation. As an example, the sample Flight Risk Assessment Tool as outlined in InFO 07015 scores icing as a risk value of five when it is moderate to severe. However, for most general aviation aircraft, known icing conditions of any value should be considered grounds for cancellation or postponement of a flight.

13. Wings of Mercy must develop and implement an initial pilot ground training program that includes the following:

   a. Wings of Mercy operational policies and procedures;

   b. Principles and methods for determining weight and balance, and runway limitations for takeoff and landings;

   c. Principles and methods of managing passenger needs and handling special equipment;

   d. Principles and methods of aviation professionalism, decision-making, risk management and mitigation, and determining personal minimums; and

   e. Informing the pilot of where a copy of this exemption can be located and requiring the pilot to become familiar with the conditions and limitations.

14. Recurrent training is required for all pilots operating under this exemption. The annual recurrent training program must include verification that each pilot is adequately trained, current, and proficient on all of the elements in the Wings of Mercy initial pilot training program described in Condition and Limitation No. 13.

[6] Available at https://www.faa.gov/sites/faa.gov/files/other_visit/aviation_industry/airline_operators/airline_safety/inFO07015.pdf.

15. Wings of Mercy may not exercise the relief granted by this exemption unless Wings of Mercy receives verification indicating acceptance of the Wings of Mercy risk assessment tool (Condition and Limitation No. 12) and the initial and recurrent pilot ground training program (Condition and Limitation Nos. 13 and 14) from the FAA General Aviation & Commercial Division (AFS-800). This document may be sent to the FAA Airman Certification and Training Branch, 800 Independence Ave., SW, Washington, DC 20591 or via e-mail to 9-AFS-800-Correspondence@faa.gov. Electronic submission is preferred.

16. Wings of Mercy must maintain a copy of the aircraft logbook entry for the most recent annual inspection of any aircraft used to conduct flights under this exemption.

17. The privileges of this exemption may be exercised only for flights within the District of Columbia, the 48 contiguous United States, its territories, and the states of Alaska and Hawaii. This exemption is not valid for operations in airspace outside of the United States, or in an intrastate operation that involves flight through international airspace.

18. The FAA may, at any time or place, conduct inspections of the pilots, aircraft, and any records required to be kept in accordance with this exemption.

Failure to comply with any of the above conditions and limitations may result in the immediate suspension or rescission of this exemption.

The Effect of the FAA's Decision

This exemption maintains the termination date of March 31, 2030, unless sooner superseded or rescinded.

To request an extension or amendment to this exemption, please submit your request by using the Regulatory Docket No. FAA-2024-2049 (*http://www.regulations.gov*). In addition, you should submit your request for extension or amendment no later than 120 days prior to the expiration listed above, or the date you need the amendment, respectively.

Any extension or amendment request must meet the requirements of 14 CFR § 11.81.

Issued in Washington, D.C., on July 17, 2026

/s/

Jonathan D. Ottney
Acting Deputy Executive Director, Flight Standards Service

AFS-27-00308-E

Exhibit 2

NOTICE U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

N 8900.786

National Policy

Effective Date:
8/12/26

Cancellation Date:
8/12/27

SUBJ: Surveillance for Charitable Medical Flight Exemptions

1. Purpose of This Notice. This notice provides guidance to Federal Aviation Administration (FAA) personnel of the requirement to conduct surveillance on holders of regulatory exemptions issued to Volunteer Pilot Organizations (VPO) authorized to conduct Charitable Medical Flights (CMF) operation exemptions under Title 14 of the Code of Federal Regulations (14 CFR) §§ 61.113(a) and (c) and 119.1.

2. Audience. The primary audience for this notice is Office of General Aviation Safety Assurance (GASA) aviation safety inspectors (ASI) with whom exemption holders operate within their Area of Responsibility (AOR). The secondary audience includes the Office of Safety Standards (OSS) and the Office of Foundational Business.

3. Where You Can Find This Notice. You can find this notice on the MyFAA employee website at https://employees.faa.gov/tools_resources/orders_notices and the Dynamic Regulatory System (DRS) at https://drs.faa.gov. Operators and the public can find this notice on the FAA's website at https://www.faa.gov/regulations_policies/orders_notices and DRS.

4. Background.

a. This notice outlines policies and procedures that ASIs must follow to conduct surveillance of the exemption holders referenced above to ensure continued compliance with the conditions and limitations specified in their exemption grant letters.

b. CMF exemptions are granted to VPOs to conduct CMFs under an exemption to 14 CFR §§ 61.113(a) and (c) and 119.1. Because CMF exemption holders operate while carrying passengers and cargo, they will also be included in the surveillance program to ensure continued compliance and safety.

5. Guidance. FAA Order 1800.56, National Flight Standards Work Program Guidelines (NPG), was revised to include this requirement in the national work program. This notice provides interim guidance that will be formally incorporated into FAA Order 8900.1, Flight Standards Information Management System, at a later date. Before conducting surveillance, inspectors must have a thorough understanding of each exemption holder's specific conditions and limitations. Surveillance may be conducted by visiting the exemption holder's base of operations, requesting the exemption holder to appear at the Flight Standards District Office

(FSDO), or, when appropriate, utilizing remote technology inspection methods in accordance with Order 8900.1, Volume 1, Chapter 3, Section 9, Flight Standards Collaborative Use of Remote Technology.

a. Items for Review Relating to All Exemptions. Generally, all exemptions have several common items that must be reviewed.

(1) Exemption Holder. The inspector must verify the exemption holder's information, including address and contact details, is accurate and up to date.

(2) Validity Period. The inspector must verify that the exemption remains valid. CMF exemptions are issued for a 5-year validity, in accordance with the requirements of Section 830 of the FAA Reauthorization Act of 2024.

(3) Conditions and Limitations. Prior to initiating the inspection, the inspector must review the exemption holder's conditions and limitations to determine which documentation will be required to verify compliance.

(4) Noncompliance. If the inspector determines the exemption holder is not in compliance with the conditions and limitations, they must document the findings, gather supporting evidence, and forward the information to the General Aviation and Commercial Division (AFS-800) for further action. The inspector must also complete the Safety Assurance System (SAS) Activity Recording (AR) record as outlined in subparagraph b(13) below. When selecting among compliance, administrative, and legal enforcement actions related to regulatory noncompliance, or another safety issue is discovered, follow the process contained in Order 8900.1, Volume 14, Chapter 1, Section 2, Flight Standards Service Compliance Action Decision Procedure, to determine the appropriate FAA action.

b. Items for Review Relating Specifically to CMF Exemptions. This subparagraph provides guidance specific to ASIs conducting surveillance on CMF exemption holders. The requirements in this notice apply to compliance with conditions and limitations described in the sample grant letter in Appendix A, Sample Grant Letter (Wings of Mercy Exemption).

> **Note:** Conditions and limitations may vary from exemption to exemption. Inspectors must review the individual exemption holder's grant letter to verify that a particular condition or limitation applies. An exemption holder is not required to comply with a condition and limitation not specified in their individual grant letter.

(1) The inspector must review the exemption holder's process for verification of pilot qualifications and training. This process must include a means to verify each pilot's qualifications to act as pilot in command (PIC) prior to each flight.

(2) The inspector must review the documentation showing all of the exemption holder's pilots' flight experience, airman certificate information, and currency of an FAA medical certificate to ensure the pilots meet any requirements specified in the exemption grant letter as follows:

(a) Each pilot must have at least a Private Pilot Certificate with an instrument rating or Airline Transport Pilot (ATP) Certificate that is appropriate for the aircraft to be flown.

(b) Each pilot must hold at least a second-class medical certificate and have a current flight review in the same aircraft category, class, and type.

(c) Within the preceding 12 calendar months, each pilot must have an instrument proficiency check (IPC) meeting the requirements of 14 CFR § 61.57(d). The IPC must be conducted in accordance with FAA-S-ACS-8, Instrument Rating – Airplane Airman Certification Standards. This requirement may be substituted by an FAA practical test for an ATP Certificate or instrument rating.

(d) In addition to meeting the IPC requirement of 14 CFR § 61.57(d), the pilot must meet the recent flight experience requirements of 14 CFR § 61.57(c) in the same aircraft category, class, and type (if a type rating is required) being flown.

(e) Each pilot must have a minimum total flight time of 500 hours, with no less than 400 hours as PIC flight time, and a minimum of 50 hours in the specific make and model (M/M) of the aircraft being flown. A minimum of 50 hours as PIC flight time must have been logged within the 12 calendar months immediately preceding the month of the flight, and a minimum of 12 hours flown and logged within the preceding 3 calendar months prior to the month of the flight.

Note: In lieu of this requirement, a pilot may have logged 2 hours of flight training with a flight instructor within the preceding 3 calendar months prior to the month of the flight.

(f) For all operations under this exemption grant letter, the pilot must meet the recent flight experience requirements for night operations (per 14 CFR § 61.57(b)) in an aircraft of the same category, class, and type (if a type rating is required).

(3) The inspector must review the time and duty records to ensure compliance, and all operations under the exemption grant letter must be in compliance with the following flight duty, rest, and flight time limitations (a duty starts when the pilot arrives at the airport and begins preparation for the flight and terminates upon completion of the postflight inspection of the aircraft):

(a) No pilot may fly more than 8 hours of pilot time (per 14 CFR § 61.1) within any 24-consecutive-hour duty-day period;

(b) No pilot may perform a duty day in excess of 12 consecutive hours; and

(c) Once the pilot has performed 12 consecutive hours of duty, the pilot must rest for a period of at least 12 hours before conducting any other CMF.

(4) The inspector must review the exemption holder's documentation of each CMF and reimbursement containing the following information, at a minimum:

(a) Name and certificate number of the PIC;

(b) Name and identifier of the departure and arrival airports;

(c) Name of all occupants of the airplane, excluding the PIC;

(d) Date and time of the departure and arrival; and

(e) Amount of fuel reimbursement.

(5) The inspector must review the exemption holder's passenger briefing procedures to ensure a passenger briefing is conducted in accordance with the applicable conditions and limitations.

(6) The inspector must determine if the aircraft utilized under this exemption has a Standard Airworthiness Certificate, which can be done by inspecting the Airworthiness Certificate or by reviewing the data in the Safety Performance Analysis System (SPAS) by the aircraft registration number.

(7) The inspector must determine if the aircraft has been maintained and inspected in accordance with 14 CFR part 91 subpart E, 14 CFR part 43, or other inspection programs approved by the FAA. The inspector must determine if a copy of the aircraft logbook entry for the most recent annual inspection of any aircraft used to conduct flights under this exemption has been retained. Coordinate with your airworthiness team if you need assistance with this item.

(8) The inspector must review the preflight risk assessment tool. These tools must be completed by the PIC before each flight and must be transmitted to the exemption holder prior to takeoff for any flight operated under this exemption. The inspector must determine if the completed tool has been retained by the exemption holder for a minimum of 30 days. The inspector must determine if the exemption holder has identified a maximum score flight value, or other appropriate measures, that is permissible for a flight to be initiated under this exemption.

(9) The inspector must determine if the exemption holder has developed and implemented an initial pilot ground training program that must include the following:

(a) Operational policies and procedures;

(b) Principles and methods for determining Weight and Balance (W&B), and runway limitations for takeoff and landings;

(c) Principles and methods of managing passenger needs and handling of special equipment;

(d) Principles and methods of aviation professionalism, decision making, risk management and mitigation, and determined personal minimums; and

(e) Informing the pilot of where a copy of the exemption can be located and requiring the pilot to become familiar with the conditions and limitations.

(10) The inspector must review the records to determine if the recurrent training requirements have been accomplished for all the pilots operating under this exemption. The annual recurrent training program must include verification that each pilot is adequately trained, current, and proficient on all of the elements in the exemption holder's initial pilot training program described in the conditions and limitations.

(11) The inspector must determine if the exemption holder has received acceptance from AFS-800 for their risk assessment tool and the initial and recurrent pilot ground training programs.

(12) The inspector must ensure that the exemption holder maintains the records mentioned above for the validity period of the exemption unless otherwise specified.

(13) For National Flight Standards Work Program Guidelines (NPG) Activity, conduct one 1623 (for 14 CFR part 91) and one 1667 (for 14 CFR part 61) for each exemption holder as specified above; the activities must be created locally. The Safety Assurance office that has managing responsibility for the FAA inspectors conducting the required surveillance in accordance with this notice must use planned activities or SAS tasks for office tracking and validation of completion. Enter the following information in each respective field:

(a) National Use: Select "CMF" from the drop-down menu.

(b) "Non-Cert": Enter the name of the VPO exactly as it is listed on the exemption.

(c) Activity Summary—"Add New Comment":

1. Primary Area: "B-General Aviation Operations (parts 61)."

2. Keyword Category: "600-Conformance."

3. Keyword: "635 Public Safety."

4. Opinion Code: As applicable, "I-Information," "P-Potential," or "U-Unsatisfactory."

5. Comment: A single unsatisfactory item warrants the use of Opinion Code "U-Unsatisfactory." To communicate all unsatisfactory outcomes, please contact AFS-800 at 9-AFS-800-Correspondence@faa.gov.

Note: When noncompliance is observed (E-Enforcement or Q-Compliance Action), follow the instructions as per Order 8900.1, Volume 10, Chapter 5, Section 4, Safety Assurance System: Tasks and Activity Recording, Table 10-5-4C, Result Codes.

6. Notification. AFS-800 will notify via email GASA leadership and the responsible Flight Standards offices, including their division managers, when these exemption holders are in their AOR. Note this may be based on business address or primary area of operations as determined by AFS-800. Inspectors must provide surveillance to all exemption holders every 12 months.

7. Disposition. We will incorporate the information in this notice into Order 8900.1 before this notice expires. Direct questions or comments concerning the information in this notice to AFS-800 at 9-AFS-800-Correspondence@faa.gov.

Robert Reckert for
Hugh Thomas
Executive Director, Flight Standards Service

Appendix A. Sample Grant Letter (Wings of Mercy Exemption)

U.S. Department
of Transportation
Federal Aviation Administration

Aviation Safety

800 Independence Ave
Washington, DC 20591

March 14, 2025

Exemption No. 23553
Regulatory Docket No. FAA-2024-2049

Mr. Fred Honore
Wings of Mercy, Inc.
100 South Pine Suite 393
Zeeland, MI 49464

Dear Mr. Honore:

This letter is to inform you that the Federal Aviation Administration (FAA) has granted your request for an exemption. This letter transmits the FAA's decision, explains the FAA's basis, and provides the conditions and limitations of the exemption, including the date it ends.

The Basis for the FAA's Decision

By letter received July 18, 2024, you petitioned the FAA on behalf of Wings of Mercy, Inc. (Wings of Mercy) for an exemption from §§ 61.113(a) and 61.113(c) of Title 14, Code of Federal Regulations (14 CFR) to the extent necessary to allow Wings of Mercy volunteer pilots acting as pilot in command of a flight operation to provide charitable transportation to accept and receive reimbursement for fuel costs and airport fees.

Section 830 of the FAA Reauthorization Act of 2024 (2024 Act) authorizes the FAA to issue exemptions from § 61.113(c) to allow volunteer pilots to accept reimbursement from a volunteer pilot organization for the fuel costs and airport fees attributed to a charitable medical transportation flight operation for a 5 year validity period.[1] Section 830 also sets forth required parameters for the reissuance of exemptions issued prior to the 2024 Act, stating that the Administrator shall ensure that the reissued exemption accounts for (1) the provisions of section 830(a) of the 2024 Act and section 821 of the FAA Modernization and Reform Act of 2012 (2012 Act)[2] and (2) substantial similarity to the previously issued exemptions. While the petitioner is not seeking reissuance of an expiring exemption, the FAA finds these factors to be instructive in the consideration of this exemption.

[1] Pub.L. 118-63, sec. 830 (May 16, 2024).
[2] Pub. L. 112-95 (Feb. 14, 2012).

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Section 821 of the 2012 Act required the FAA to allow an aircraft owner or operator to accept reimbursement from a volunteer pilot organization for the fuel costs associated with certain operations, subject to minimum standards imposed by the Administrator to ensure safety of flight. The FAA has historically facilitated such operations through exemptions prior to the 2012 Act[3] and continued such process in accordance with the 2012 Act. As previously stated, the 2024 Act expanded reimbursement of fees to include airport fees. Therefore, this exemption accounts for both the 2012 Act and 2024 Act by permitting a pilot operating under the conditions and limitations herein to accept and receive reimbursement for both fuel costs and airport fees. Additionally, adding airport fees would not adversely affect safety, as the petitioners and their pilots would still be required to comply with the conditions and limitations set forth herein, which the FAA has found in previous exemptions ensures a higher level of aviation safety for the flying public.

Additionally, the FAA has issued grants of exemption in circumstances similar in certain material respects to those presented in your petition (i.e., this exemption accounts for previously issued exemptions providing relief for reimbursement of fuel costs). Specifically, in Exemption Nos. 10019 and 12627 (copies enclosed), the FAA found that volunteer pilots can receive and accept reimbursement of fuel costs to provide charitable flights.

Having reviewed your reasons for requesting an exemption, I find that:

- The reissued exemption accounts for the provisions of section 830(a) of the 2024 Act and section 821 of the 2012 Act and previously issued exemptions;

- The reasons stated by the FAA for granting the enclosed Grant of Exemption Nos. 10019 and 12627 also apply to the situation presented in your petition; and

- A grant of exemption is in the public interest.

The FAA's Decision

The FAA has determined that good cause exists for not publishing a summary of the petition in the *Federal Register*. Specifically, § 11.87 provides a list of factors that may be considered in FAA's decision to not request comment; however, this list is not exhaustive. While the reimbursement of airport fees would set a precedent for future volunteer pilot exemptions, the FAA finds notice and comment to be unnecessary to meet the statutory language and intent of the 2012 and 2024 Acts. Accordingly, we have determined that additional delay to issuance of this exemption by seeking comments is not warranted and would adversely affect your ability to facilitate increased access to medical care to underserved individuals and families. In accordance with section 830(a) of the 2024 Act, this exemption shall be valid for five years.

The FAA has determined that relief provided historically in Exemption Nos. 10019 and 12627 was incomplete. Instead of only providing relief from § 61.113(a) and (c), the exemptions should

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[3] E.g., Exemption No. 10009.

have also provided relief to 14 CFR part 119, specifically § 119.1. Section 119.1 outlines the applicability of the part 119 certification requirements for air carriers and commercial operators. To enable Wings of Mercy to conduct operations under part 91 rather than as a part 119 certificated commercial operator, the FAA is granting relief from § 119.1. The FAA notes that providing § 119.1 relief does not in and of itself substantively change the operating parameters for Wings of Mercy consistent with the historical conditions and limitations that applied.

The FAA has determined that the justification for the issuance of Exemption Nos. 10019 and 12627 remains valid and in the public interest. Therefore, under the authority contained in 49 U.S.C. §§ 106(f), 40113, and 44701 which the FAA Administrator has delegated to me, I hereby grant Wings of Mercy, Inc. an exemption from 14 CFR §§ 61.113(a), 61.113(c), and 119.1 to the extent necessary to allow Wings of Mercy volunteer pilots acting as pilot in command of a flight operation to provide charitable transportation to accept and receive reimbursement for fuel costs and airport fees, subject to the conditions and limitations described below.

Conditions and Limitations

1. The following definitions apply when these terms are used in this exemption:

    a. Charitable Medical Flight (CMF): A flight operation to provide transportation for an individual or organ for medical purposes (and for other associated individuals), if the aircraft owner or operator has volunteered to provide such transportation.

    b. Volunteer Pilot Organization (VPO): An organization:

        i. Described in section 501(c)(3) of the Internal Revenue Code of 1986 and exempt from taxation under section 501(a) of such Code; and

        ii. Organized for the primary purpose of providing, arranging, or otherwise fostering charitable medical transportation.

2. Before exercising the relief granted by this exemption, Wings of Mercy must ensure it meets the definition of a VPO and that the flight meets the definition of a CMF, as specified in Condition and Limitation No. 1.

3. This exemption may be exercised only for CMFs conducted by Wings of Mercy. A CMF includes flights that are intended to reposition the aircraft to the client pick-up location, as well as reposition the aircraft following the client drop-off. Any repositioning flight must be from the aircraft home base to and from the point of client pick-up/drop-off location by the most practical route.

4. Wings of Mercy must ensure the following items are available to any representative of the FAA Administrator, upon request:

a. A detailed description of Wings of Mercy's process for verification of each pilot's qualification and training. This process must include a means to verify each pilot's qualifications to act as pilot-in-command (PIC) prior to each flight;

b. Documentation showing all Wings of Mercy pilots' flight experience, airman certificate information, and currency of FAA medical certificates.

c. Documentation from each pilot showing that at the time he/she accepts a CMF under this exemption, he/she meets all minimum standards and appropriate currency requirements established by Wings of Mercy, part 61, and all Conditions and Limitations of this exemption; and

d. Documentation of each flight and reimbursement containing the following information, at a minimum:

   i. Name and pilot certificate number of the PIC;

   ii. Name and identifier of the departure and arrival airports;

   iii. Name of all occupants of the airplane excluding the PIC;

   iv. Date and time of departure and arrival; and

   v. Amount of the fuel reimbursement.

e. All the documentation required under Condition and Limitation No. 4 must be maintained by Wings of Mercy for a minimum of 24 calendar months.

5. All pilots operating under the terms of this exemption must possess the following certificates, qualifications, and aeronautical experience –

   a. An instrument rating or Airline Transport Pilot (ATP) certificate that is appropriate to the aircraft being flown;

   b. A minimum total flight time of 500 hours, with no less than 400 hours as PIC, and a minimum of 50 hours in the specific make and model of the aircraft being flown;

   c. A minimum of 50 hours as PIC must have been logged within the preceding 12 calendar months prior to the month of the flight;

   d. A minimum of 12 hours flown and logged within the preceding 3 calendar months prior to the month of flight. In lieu of this requirement, a pilot may have logged 2 hours of flight training with a certificated flight instructor within the preceding 3 calendar months prior to the month of the flight;

e. A second-class medical certificate (per §§ 61.2 and 61.23(a)(2)(ii));

f. A current flight review (per § 61.56(a)) in the same aircraft category, class, and type (if a type rating is required) being flown;

g. Within the preceding 12 calendar months, an instrument proficiency check (IPC) meeting the requirements of § 61.57(d). The IPC must be conducted in accordance with the Instrument Rating — Airplane Airman Certification Standards. This requirement can be substituted by an FAA practical test for an ATP certificate or instrument rating;

h. In addition to meeting the IPC requirement of § 61.57(d) as specified in Condition and Limitation No. 5(g), the pilot must meet the recent flight experience requirements of § 61.57(c), in the same aircraft category, class, and type (if a type rating is required) being flown; and

i. For all operations under this exemption, the pilot must meet the recent flight experience requirements for night operations (per § 61.57(b)) in an aircraft of the same category, class, and type (if a type rating is required).

6. All operations under this exemption must be in compliance with the following flight duty, rest, and flight time limitations (a duty day starts when the pilot arrives at the airport and begins preparation for the flight and terminates upon completion of the post-flight inspection of the aircraft):

   a. No pilot may fly more than 8 hours of flight time (per § 61.1) within any 24-consecutive-hour duty day period;

   b. No pilot may perform a duty day in excess of 12 consecutive hours; and

   c. Once the pilot has performed 12 consecutive hours of duty, the pilot must rest a period of at least 12 hours before conducting any other CMF.

7. Prior to each takeoff, the PIC must ensure that all occupants have been orally briefed on the following:

   a. The flight is being permitted under this grant of exemption and that the operator is not a certificated commercial operator;

   b. When, where, and under what conditions smoking is allowed;

c. Use of safety belts, shoulder harnesses, and child restraint systems: when, where, and under what conditions it is necessary to fasten passenger safety belts and, if installed, shoulder harnesses;

d. The placement of seat backs in an upright position before takeoff and landing;

e. Location and means for opening the passenger entry door and emergency exits;

f. Location of survival equipment;

g. Use of normal and emergency oxygen installed; and

h. Location and operation of fire extinguishers.

An FAA sample briefing document can be found in the July/August 2014 edition of the FAA Safety Briefing Magazine.[4]

8. Wings of Mercy must implement procedures to notify the passengers (or their legal guardians) who will be on the flight, that the flight operations are for charitable purposes and are not subject to the same FAA requirements as a commercial flight. These procedures must allow for the notification to be given as early as possible to the passengers (or their legal guardian). Such notification must also be provided to any individual who inquires about receiving or scheduling a CMF.

9. Each aircraft operated under this exemption must have a standard airworthiness certificate.

10. The aircraft must be maintained and inspected in accordance with 14 CFR part 91 Subpart E, 14 CFR part 43, or other inspection programs approved by the FAA.

11. All pilots operating under this exemption must comply with the following requirements:

    a. All flights operating under this exemption must activate an Instrument Flight Rules (IFR) flight plan. The earliest the flight plan may be cancelled is upon visual contact with the destination airport;

    b. For flights in instrument meteorological conditions (IMC), each pilot may only use airports that have functioning, published, precision approach procedures;

[4] Available at https://www.faa.gov/sites/faa.gov/files/2022-01/JulAug2014.pdf.

c. Each pilot must add 100 feet and ½ mile to all instrument approach minimums;

d. Each pilot must add 50 percent to pilot operating handbook (POH) runway length performance for obstacle clearance on takeoff and landing under ambient conditions;

e. For IMC takeoff minimums, the PIC must ensure that the weather meets approach landing minimums with additional margin noted in Condition and Limitation No. 11(c) (Example: If the Baltimore-Washington International Airport minimums are 200/1/2, then the takeoff minimums will be at least 300 feet and 1 statute-mile visibility);

f. Prior to each takeoff, the PIC must ensure that patients, who may need the assistance of another person to exit the aircraft if an emergency occurs, have received a briefing as to the procedures to be followed if an evacuation occurs; and

g. Each pilot will utilize and brief passengers about sterile cockpit procedures as defined in 14 CFR § 135.100.

12. Wings of Mercy must develop and implement a preflight risk assessment tool. The tool must be completed by the PIC before each flight and must be transmitted to Wings of Mercy prior to takeoff for any flight operated under this exemption. The completed tool must be retained by Wings of Mercy for a minimum of 30 days. Wings of Mercy must identify a maximum score flight value, or other appropriate measure, that is permissible for a flight to be initiated under this exemption. A sample risk assessment tool is available in the FAA Information for Operators (InFO) 07015[5].

    The FAA recognizes that any sample tool used to assess any potential safety risk during preflight planning should be modified to adequately address the risk for general aviation aircraft and Wings of Mercy's specific operation. As an example, the sample Flight Risk Assessment Tool as outlined in InFO 07015 scores icing as a risk value of five when it is moderate to severe. However, for most general aviation aircraft, known icing conditions of any value should be considered grounds for cancellation or postponement of a flight.

13. Wings of Mercy must develop and implement an initial pilot ground training program that includes the following:

    a. Wings of Mercy operational policies and procedures;

[5] Available at https://www.faa.gov/sites/faa.gov/files/other_visit/aviation_industry/airline_operators/airline_safety/inFO07015.pdf.

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b. Principles and methods for determining weight and balance, and runway limitations for takeoff and landings;

c. Principles and methods of managing passenger needs and handling special equipment;

d. Principles and methods of aviation professionalism, decision-making, risk management and mitigation, and determining personal minimums; and

e. Informing the pilot of where a copy of this exemption can be located and requiring the pilot to become familiar with the conditions and limitations.

14. Recurrent training is required for all pilots operating under this exemption. The annual recurrent training program must include verification that each pilot is adequately trained, current, and proficient on all of the elements in the Wings of Mercy initial pilot training program described in Condition and Limitation No. 13.

15. Wings of Mercy may not exercise the relief granted by this exemption unless Wings of Mercy receives verification indicating acceptance of the Wings of Mercy risk assessment tool (Condition and Limitation No. 12) and the initial and recurrent pilot ground training program (Condition and Limitation Nos. 13 and 14) from the FAA General Aviation & Commercial Division (AFS-800). This document may be sent to the FAA Airman Certification and Training Branch, 800 Independence Ave., SW, Washington, DC 20591 or via e-mail to 9-AFS-800-Correspondence@faa.gov. Electronic submission is preferred.

16. Wings of Mercy must maintain a copy of the aircraft logbook entry for the most recent annual inspection of any aircraft used to conduct flights under this exemption.

17. The privileges of this exemption may be exercised only for flights within the District of Columbia, the 48 contiguous United States, its territories, and the states of Alaska and Hawaii. This exemption is not valid for operations in airspace outside of the United States, or in an intrastate operation that involves flight through international airspace.

18. The FAA may, at any time or place, conduct inspections of the pilots, aircraft, and any records required to be kept in accordance with this exemption.

Failure to comply with any of the above conditions and limitations may result in the immediate suspension or rescission of this exemption.

The Effect of the FAA's Decision

This exemption terminates on March 31, 2030, unless sooner superseded or rescinded.

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To request an extension or amendment to this exemption, please submit your request by using the Regulatory Docket No. FAA-2024-2049 (*http://www.regulations.gov*). In addition, you should submit your request for extension or amendment no later than 120 days prior to the expiration listed above, or the date you need the amendment, respectively.

Any extension or amendment request must meet the requirements of 14 CFR § 11.81.

Sincerely,

/s/

Hugh J. Thomas
Deputy Executive Director, Flight Standards Service

Enclosure: Exemption Nos. 10019 and 12627

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