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April 19, 2018

The Honorable Bill Shuster, Chair
The Honorable Peter DeFazio, Ranking Member
House Transportation and Infrastructure Committee
2251 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Shuster and Ranking Member DeFazio:

On behalf of our 38 million members and all Americans age 50 and older, AARP is writing to express our opposition to any proposals that would impose a mandatory retirement age on general aviation and commercial charter pilots (FAR Parts 91K and 135). AARP has long opposed mandatory retirement; using an arbitrary age as a proxy for competence is wrong in any occupation, and it is wrong for pilots. Pilots should be judged on the basis of their individual ability, flying skills, and their health, not on stereotypes or mistaken assumptions about their fitness based on age.

The pilots affected are already subject to twice-yearly medical certifications and “check ride” tests of fitness and competency to fly. AARP supports requirements for testing and exams that are designed to measure the job-related characteristics needed to do the job. If different or additional types of tests are needed, the focus should be on determining *that*. But age should not be used as a shortcut to devising more meaningful and accurate means of measuring qualifications. Aging affects different pilots differently, and the greater experience that comes with more years of flying can neutralize some effects of aging.

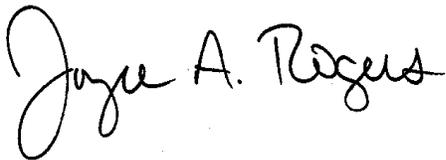
The proposal to impose a mandatory retirement age on charter and general aviation pilots is not about safety. Otherwise, it would not have a coverage threshold of 100,000 flights per year, which apparently applies only to one company.¹ That safety is not the driving motivation for this proposal is also revealed by the fact that time-share charter jet companies often use back-up charter companies for high-demand times such as around Thanksgiving or during the recent solar eclipse; these smaller companies, which would remain exempt from the proposed age-65 retirement requirement, themselves often use older pilots.

¹ K. Lynch, Congress Said to Mull Age 65 Extension to Part 91K/135, *Aviation International News* (Oct. 19, 2017), at <https://www.ainonline.com/aviation-news/business-aviation/2017-10-19/congress-said-mull-age-65-extension-part-91k/135> (accessed Apr. 13, 2018).

The shortage of pilots facing carriers² – a circumstance due in no small part due to the impending mandatory retirements of boomer-generation pilots – has some experts proposing that the mandatory retirement age for pilots be *increased*, including for *commercial* airlines: “There appears to have been little if any impact on airline safety since ... [the increase in retirement age to 65 from 60] was implemented. Raising this age to 70, perhaps in increments, should now be considered.”³ A few years ago, Japan increased the retirement age for their domestic commercial pilots from 65 to 67.⁴ In sum, a proposal to impose a compulsory retirement age on pilots who currently are not subject to one is a proposal headed in exactly the wrong direction.

On behalf of an aging workforce, AARP urges the House not to include a new mandatory retirement age in its FAA reauthorization bill. If an amendment is offered to do so, we urge the House to vote it down. If you have any questions or need additional information, please feel free to contact me or have your staff contact Deborah Chalfie on our Government Affairs staff at 202-434-3723.

Sincerely,



Joyce Rogers, Senior Vice President
AARP Government Affairs

Cc: The Honorable Paul Ryan, Speaker of the House
The Honorable Nancy Pelosi, Minority Leader

² See Boeing, *Pilot Outlook: 2017 – 2036*, at <https://www.boeing.com/commercial/market/pilot-technician-outlook/2017-pilot-outlook/> (accessed Apr. 13, 2018).

³ A. Diehl, “Opinion: Here Is a Three-Pronged Approach to Pilot Shortage,” *Aviation Week & Space Technology* (May 8, 2015) at <http://aviationweek.com/commercial-aviation/opinion-here-three-pronged-approach-pilot-shortage> (accessed Apr. 13, 2018); see also M. McGee, *Air Transport Pilot Supply and Demand: Current State and Effects of Recent Legislation* 110 (Rand Corp. 2015), available at https://www.rand.org/pubs/rgs_dissertations/RGSD351.html (if shortages are as predicted after 2019, “the FAA could consider raising the current mandatory retirement age to at least 67”).

⁴ “Pilots’ retirement age to be raised to 67 to cope with shortage,” *Japan Today* (Feb. 23, 2015), at <https://japantoday.com/category/national/pilots-retirement-age-to-be-raised-to-67-to-cope-with-shortage> (accessed Spr. 18, 2018); J. Soble, “The Pilot in the Cockpit? In Japan, He Might Be a Retiree,” *N. Y. Times* (July 28, 2017), available at <https://www.nytimes.com/2017/07/28/business/japan-older-workers-retired-pilot.html>.