The Santa Barbara Flying Club (SBFC) has been supporting general aviation on the field for nearly 70 years. Most of us know that the Marine Corps assumed control of Santa Barbara’s airfield for the duration of World War II. On August 17, 1947, the United States War Asset Administration returned the facility to the City of Santa Barbara. Six days later, on August 23, 1947, three Santa Barbarans (Ada Chapman, Peter Alferitz, and Carlo Campitelli) signed the Articles of Incorporation to create the Santa Barbara Flying Club. Since its founding, SBFC has provided a mechanism for pilots to share the expense of operating aircraft in a cost-effective and efficient manner. It has worked in a compatible manner with others (FBOs, Flight Schools, etc.) on the field throughout its life. Santa Barbara’s pilot community is unquestionably larger, more active, and healthier as a result of the SBFC.

We are meeting here in response to a recently revised FAA policy concerning flying clubs (Ref 1). In recognition of the value of flying clubs to aviation, the FAA’s new policy explicitly expands the scope of its members’ options for flight instruction. The new policy now permits club members who are FAA-certified flight instructors (CFIs) to instruct fellow club members for compensation in club aircraft. In past FAA policy, flying club members were permitted to take flight instruction from unpaid CFI club members, or hire non-member instructors for pay (i.e., at a flight school or with an independent CFI authorized by the airport sponsor to provide flight instruction in owner-provided aircraft). Now, members may hire both member and non-member instructors. The aim of the FAA’s new, expanded policy is to better enable flying club members to obtain flight training “...in a convenient, cost-effective, and familiar environment.” The new FAA policy is good for the aviation community.

The airport sponsor (City of Santa Barbara, Airport Administration) recognizes the need to update the SBA Minimum Standard Requirements (MSR) to be consistent with FAA policy. In preparing to do so, the Administration requested SBFC to make recommendations on how to accomplish this. Changes required to bring the MSR into compliance with FAA policy are straightforward and easily accomplished. SBFC has submitted such recommendations to the Airport Administration (Ref 2).

Unfortunately, one of the local flight schools, Above All Aviation (AAA), appears to be attempting to influence Airport Administration to contrast the new FAA policy to enhance AAA’s business in a manner that would hinder, rather than enhance, the operation of flying clubs. Any such action would be in direct opposition to the intent of the new FAA policy. Thus the principal question is: Is the Airport Administration’s objective to publish an updated MSR in compliance with FAA policy, or is it to make disparate changes that veer 180° from the FAA’s intent, simply to prep up one selected business on the field.

At a prior Airport Commission meeting, it became clear that AAA is attempting, among other things, to prevent flying clubs at SBA from informing the community of the economic benefits of joining a flying club to access aircraft and training. Specifically, at this meeting, AAA misquoted FAA policy with claims that a flying club may not advertise its benefits. The new FAA policy in fact simply states:

"Flying Clubs may not indicate in any form of marketing and/or communications that they are a flight school, and Flying Clubs must not indicate in any form of marketing and/or communications that they are a business where people can learn to fly."

(FAA Order 5190.6B, paragraph 10.6 (c)(9)).
The SBFC is, and always has been, in full compliance with this: It is not a business, nor does it present itself as a flight school in any way, shape, or form. SBFC’s public website clearly states: “The club is not a flight school” (Ref 3). The club publicly states that its members may independently contract (outside the club) for flight instruction at substantially lower cost than possible with representative flight schools. Providing such information to the public is not a violation of any FAA policy, and, furthermore, is an exercise of free speech as protected by the United States Constitution.

FAA Order 5190.6B, paragraph 10.6 (c)(8) states:

“Flying Clubs may not hold themselves out to the public as fixed based operators, a specialized aviation service operation, maintenance facility or flight school and are prohibited from advertisements as such...”

AAA misrepresented the above passage by eliminating the underlined words “as such” and prematurely terminated the quote with the word “advertisements.” This misquote radically altered the meaning of the FAA policy and left the false impression that advertisements of any type are prohibited. The FAA’s intent is clearly not to eliminate a club’s ability to advertise its offering.

In addition, AAA quoted a portion of FAA Order 5190.6B, paragraph 10.6 (c)(3), and omitted mentioning the option of a club member seeking instruction from a non-member lessee based on the airport. This option is exceedingly important to the well-being of any flight organization (e.g., nonprofit corporation, association, or aircraft partnership). This right has been established for many years at SBA as well as other airports and explicitly allows CFIs with a home office to instruct on the field in owner-provided aircraft. This must not be changed so as to force members to seek instruction at flight schools. This is clearly not the intent of the FAA.

In summary, SBFC believes that the new FAA policy can be easily accommodated in an updated MSR, and should be done so without delay. Additional, gratuitous local regulation intended to prop up one marginal business is not in the best interest of our fine city. Adding requirements that contradict FAA policy, whose sole purpose would be to satisfy unjustified demands by AAA would not only be inappropriate. It would damage every other facet of the general aviation community and violate the Administration’s obligation to maintain airport operations for the use and benefit of the public.

References:

1/ Petition of the Aircraft Owner and Pilots Association (AOPA) to Amend FAA Policy Concerning Operation of Flying Club Operations at Federally Obligated Airports. Federal Register, Vol. 81, No. 50 (March 15, 2016)


3/ Santa Barbara Flying Club. SBFC’s Public Website (http://www.santabarbaraflyingclub.org)