



July 7, 2025

Stayce Hoult
NASA PRA Clearance Officer
NASA Headquarters
300 E Street, SW
JC0000
Washington, DC 20546
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Re: NASA Docket NASA-2025-0004

The Piper M-Class Owners & Pilots Association (PMOPA) appreciates the opportunity to comment on the practical utilization, value of, and ways to minimize the burden related to collection of data on respondents to NASA's Aviation Safety Reporting System (ASRS). PMOPA represents the interests of 1,200 members worldwide who own and pilot Piper PA-46 M-Class aircraft.

NASA was established by the National Aeronautics and Space Act of 1958. This Act created NASA to lead the United States' civilian space program. A primary goal was to conduct research into aeronautics and space. For close to 50 years, pilot reports submitted via ASRS, have provided data points that help identify threats, errors, and hazards to aviation safety. ASRS was developed out of the need to improve aviation safety by collecting and disseminating safety information that might otherwise be lost. NASA, as a neutral third party with no regulatory authority over pilots, air traffic controllers, or maintenance professionals, is the ideal Federal agency to administer the ASRS program. This system, where reporters can submit safety concerns confidentially and without fear of enforcement action, is critical to improving aviation safety.

PMOPA prioritizes a data-driven approach to safety of flight and fully support programs, like ASRS, that provide valuable insights as to what is actually happening in the national airspace system that could degrade safety and, importantly, spurs opportunities to educate our community. Our educational outreach, which includes in-person conferences, on-line webinars, and written articles in our *PMOPA Magazine* extend the reach and effectiveness of ASRS reports to help prevent similar situations – like those reported — from happening in the future. To date, over 300 NASA ASRS reports have been filed voluntarily by pilots of Piper M-Class Aircraft. PMOPA reviews ASRS reports from the M-Class fleet and identifies actionable insights. ASRS reports complement the data collection and analysis PMOPA's Safety Committee conducts via our Flight Data Monitoring program.

PMOPA also appreciates NASA's interest in modernizing data collection and reporting via the ASRS. The current web-based Electronic Report System is adequate, providing standard fields for data normalization as well as free-field narrative for the reporter to provide a detailed description of the event. The paper form mirrors the electronic reporting, and its availability may be useful for a select group of pilots. However, we anticipate the need for paper reporting will decline over time, with more

Piper M-Class Owners & Pilots Association
1800 M Street, NW
Suite 400S
Washington, DC 20036



reporters opting for electronic submission. Today, most pilots utilize a mobile application (App) such as GARMIN Pilot or ForeFlight for flight planning, in-flight navigation, and performance monitoring. Leveraging an API or other computer integration tool and partnering with these App providers to facilitate seamless reporting to ASRS from within these Apps – which are widely used by the pilot population — may help increase the volume and quality of submissions.

Regarding data reporting and analysis, PMOPA generally finds the web-based tool to be adequate, providing specific search fields to narrow or broaden search results. One observation and potential improvement is for NASA ASRS to review current FAA aircraft makes and models and update the ASRS search. For example, the Piper PA-46 includes a range of variants: Malibu, Mirage, Matrix, M350, JetPROP, Meridian, M500, M600, M600/SLS, and M700. In the ASRS Aircraft Make/Model search fields, only the Piper Malibu, Mirage, Matrix, and Meridian are available as search options, raising the question as to where ASRS data is included (or excluded) for JetPROP, M600 or M600/SLS, and M700 aircraft. (The M350 and M500 are effectively the same as the Malibu Mirage and Meridian respectively, but with more modern avionics.)

In closing, PMOPA supports ASRS and applauds its success to date as we collectively strive to eliminate unsafe conditions in the national aviation system and prevent avoidable accidents.

Respectfully submitted,

Mike Nichols
Chief Executive Officer
Piper M-Class Owners & Pilots Association