

COMPANY UNDERSTANDING OF MARYLAND OLC INTERPRETIVE GUIDANCE

March 25th, 2020

The MD Office of Legal Council Interpretative Guidance has recommended that the (State) Administration allows certain Businesses and Facilities within the Transportation System Sector to Remain Open, *including but not limited to* operators of commercial aircraft (manned and unmanned), and Lessors of Transportation Assets, and Companies that provide maintenance and repair services for transportation assets, including aircraft.

Page 4 of the MD OLC Interpretive guidance notes that list #2 in that document *is non-exhaustive and does not mean to exclude* businesses from the federal critical infrastructure sectors.

The federal page <https://www.cisa.gov/transportation-systems-sector> currently identifies recreational aircraft and flight schools within the list of Critical Infrastructure Sectors.

The Maryland OLC Interpretive Guidance identifies a list of businesses in the federal critical infrastructures sectors, including operators of commercial aircraft, air strips, lessors of transportation assets, and maintenance and repair services for those assets, including aircraft.

Besides the above federal reference to flight schools in the above link, 1World Aero believes that Part 61 Flight Schools fall under the categories of Commercial Aircraft Operators and Lessors of Transportation Assets for the following reasons:

- 1) Per FAR 91.409, Flight School aircraft must be maintained under 100 Hour Maintenance Inspections for For Hire operations, unlike Private Aircraft, which can be maintained under Annual Inspection schedules alone.
- 2) Flight School aircraft must be covered under Commercial Aircraft insurance policies.
- 3) Per FAR 91.133 (a)(1) and (b) Commercial Pilots may carry people For Hire, and per 61.181 (c)(1) Flight instructors must be Commercial Pilots. Further per 61.195(a) Flight instructors must limit flight training to a maximum of 8 flight hours in a 24 hour period, which is consistent with flight time limitations for Single Pilot Commercial Operators under Part 135.
- 4) Flight Schools rent out aircraft transportation assets to the public, and in the State of Maryland Flight Schools pay commercial Sales and Use Tax on that service.
- 5) Flight Schools provide Primary through Advanced Flight Training, and serve both as a screening tool for the commercial aviation industry, as well as a training and experience pipeline for Commercial Pilots and eventual Airline Transport Pilots, whom in normal times other than temporary crisis, are in high demand and provide an essential role in National infrastructure.
- 6) Flight Schools provide flight training to the public, allowing those clients to add to the pool of qualified pilots, whose skills are considered essential to the safety of National infrastructure. Further this pool supplies those who may eventually provide non-governmental services through activities including but not limited to Angel Flight, Civil Air Patrol, and Veterans Airlift Command.
- 7) Flight Schools support the credentialing, currency, and proficiency of Pilots in the interest of maintaining aviation safety.
- 8) Flight Schools provide aircraft rental transportation assets to the public, allowing Private Pilots, to bypass and relieve major airport and airline infrastructure and access and support small community

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airstrips which are deemed essential. This access brings economic support to those airstrips and associated communities in a variety of ways, from the interface with local businesses, to the conduct of small business, in many instances supporting other essential services.

While 1World Aero believes, as outlined in the above affidavit, that it provides essential services and shall continue to do so, the Company also remains highly committed to combatting the spread of COVID-19 and to Social Distancing. While the danger of contagion remains high, all Ground and Flight Training activities will be conducted consistent with CDC recommendations, particularly maximizing distance learning, social distancing, and the use of Personal Protective Equipment within 6 feet of staff, clients, or the public. Further detail of Company procedures should be found on [1World Aero.com/Resources](http://1WorldAero.com/Resources).



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