



August 1, 2014

Luc Portelance  
President  
Canada Border Services Agency  
Laurier Avenue West  
Ottawa, ON K1A 0W8

Dear Mr. Portelance:

The Canadian Owners and Pilots Association (COPA) and the Aircraft Owners and Pilots Association (AOPA) would like to thank you for forming the Interactive Advance Passenger Information (IAPI) General Aviation (GA) Working Group. We appreciate your decision to solicit the input of the general aviation community as you draft your business requirements on the implementation of IAPI. Already, the group has identified numerous issues that will need to be addressed prior to finalizing the requirements.

We believe eliminating duplicative entries by using information already provided by GA operators crossing the border will be critical to IAPI's success. Failing to do so will increase red tape, increase costs to GA, deter small business growth, and cause additional economic hardship to our sector of aviation, business owners and tourism.

As we have discussed, the existing U.S. Customs and Border Protection (CBP) eAPIS program has achieved a 99.9% compliance rate on GA traffic crossing the U.S./Canada border. Currently, the CBP eAPIS program captures all of the information that will be needed for the IAPI program. The Canada Border Services Agency (CBSA) should make using this information the top priority in building the infrastructure and operational procedures of the IAPI system.

CBP is eager to begin discussions on ways to address the technical, procedural and regulatory issues surrounding this issue and AOPA-COPA strongly encourages US CBP participation in the working group. Such participation we feel will be invaluable in establishing best practices and sharing of lessons learned along the way.

The governments of Canada and the U.S. have established a new partnership to accelerate the legitimate flow of people and goods across the border. This “Shared Vision for Perimeter Security and Economic Competitiveness” was designed to eliminate the duplicate requirements currently under consideration.

COPA and AOPA are supportive of CBSA and CBP efforts to eliminate processes that are repetitive and duplicative in nature. The single entry proposal and increased regulatory co-operation between Canada and the U.S. provides a solution that is aligned with President Barack Obama and Prime Minister Steven Harper’s original directives.



Kevin Psutka  
President,  
Canadian Owners and Pilots Association



Mark Baker  
President and CEO,  
Aircraft Owners & Pilots Association

cc: CBP Commissioner Kerlikowske