

# Aerospace Medical Association



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Federal Aviation Administration  
Office of the Chief Counsel  
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To Whom It May Concern:

The Aerospace Medical Association's response to the FAA's request for comments on a proposed policy for special issuance of medical certificates to diabetic airman applicants (Docket No. 28493) is as follows:

The Aerospace Medical Association does not feel that enough scientific and/or medical data is available to insure the safety of the issuance of medical certificates for flying duties to diabetic airmen requiring any type of medication for glycemic control. The Aerospace Medical Association supports further studies of potential protocols for selection and monitoring of diabetic airmen candidates who require such medication to obtain the needed data.

The Aerospace Medical Association recommends that such studies address, at a minimum, the following issues and concerns.

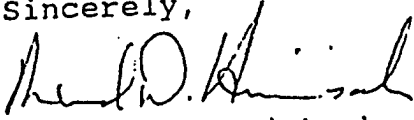
1. The risk of hyperglycemia for Type I diabetics with insufficient beta cell function.
2. The accuracy of self testing of glucose levels by airmen and the adequacy of such testing in ascertaining potentially hazardous preclinical conditions e.g. subacute hypoglycemia.
3. How to insure diabetic airmen maintain lifestyles which would not compromise tight control of their plasma glucose levels.
4. The impact on flying safety of transient visual changes secondary to serum glucose fluctuations.
5. The impact on flying safety of hypoglycemia secondary to rapid onset stress.
6. The side effects of medication(s) for diabetic control and flying safety.

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Additional concerns which would need to be addressed may become evident during the scientific assessment of the above issues.

Sincerely,



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