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Notice of Proposed Rule Making

Certification of Aircraft and Airmen for the Operation of Light-Sport Aircraft;

Modifications to Rules for Sport Pilots and Flight Instructors with a Sport Pilot Rating

In a recently registered NPRM, Docket No. FAA-2007-29015, the FAA proposes modifications to the rules governing sport pilots and instructors with a sport pilot rating. On July 27, 2004, the FAA had issued the final rule on the certification of aircraft and airmen for the operation of light-sport aircraft. However, the FAA has been recently questioning the rules "effectiveness". Because of the questioning, this NPRM would change the rule to "align the certification requirements for sport pilots and flight instructors with a sport pilot rating with those requirements currently applicable to other airmen certificates".

Comments:

After reviewing the NPRM, I believe that the proposal to change requirements involving sport pilots is necessary. The main purpose stated by the FAA of the sport pilot license was to relieve pilots of burdens encountered in private pilot training without compromising safety. After discussion with the light sport community, numerous areas were deemed unnecessary. The following areas of the sport pilot rating would be removed or amended to provide "relief" for pilots "without compromising safety."

The first action set forth by the NPRM would be to remove the requirement for instructors to log 5 hours in the same make and model light sport aircraft. Because Certified Flight Instructors are already at the highest level of expertise in their respective field, 5 hours seems unnecessary before providing training. One purpose of the sport pilot rating is to reduce the cost of flying not only for GA airports but also for leisure pilots. The requirement that instructors must fly 5 hours before training in a specific make and model could quite possibly make sport pilot training unprofitable for FBO's and increase the cost for student pilots.

Because the majority of sport pilots will be operating out of small rural airports and be training at a leisurely pace the following changes are necessary; pilots seeking privileges in powered parachute or weight-shift-control aircraft will be no longer required to have flight training in a tower controlled airport, sport pilots will no longer be required to train in the use of radios for VFR navigation and communication when the aircraft intended to be used by the pilot is not equipped with such instruments, sport pilots will no longer be required to log a certain amount of hours within 60 days of applying for a sport pilot license, and sport pilots and instructors will no longer be required to carry his or her logbook during flight. How many pilots actually operate powered parachutes out of tower controlled airports? How can a pilot use VFR navigation and communication when the aircraft is not equipped to do so? All of these changes to the sport pilot rating will make flying much more enjoyable, less costly, and less burdensome to the light sport community without compromising safety.

While the previously stated changes would make sport pilot training and flying much more enjoyable, this NPRM will make the following changes necessary for proper

standardization of sport pilot practical tests. Aircraft category and class ratings will be placed on all pilot certificates, pilots operating an aircraft with a VH above 84 knots will be required to log one hour of flight training by reference to instruments only, and pilots wishing to operate a powered parachute with an elliptical wing or an aircraft with a CAS below 87 knots will be required to get a specific endorsement. The FAA believes that all of these changes will enhance the safety of the light sport community.

Although I believe that the previously stated changes are necessary for the safety and benefit of sport pilots, other pilots disagree. Some pilots argue that NPRM's changes are unjustified and are counterproductive to the purpose of previous regulations. Others are somewhat neutral on the decision and agree with only some of the changes brought on by the NPRM.

Thank you for consideration of my suggestion