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RE: TSA-2004-19147

I am commenting on the IFR in my position as a stakeholder in the U.S. system of pilot instruction. I am an instrument rated private pilot with grave concerns about how the IFR would affect the safety of flight, the health of general aviation and the freedom that, to this point, has been available to me and other U.S. citizens.

My fellow pilots and I are safer pilots when we get recurrent training. Any bureaucratic impediments that stand between me and such training will only discourage me from getting it. It is bad public policy to encourage pilots to acquire the minimum training necessary to retain their currency and proficiency. The IFR as written defines "recurrent training" as "periodic training required for employees of certificated aircraft operators under 14 CFR parts 121, 125, 135, or Subpart K of Part 91. Only candidates who apply for such training are exempt from the fingerprinting and security threat assessments requirements under the IFR." I am therefore given the option of being fingerprinted and going through a cumbersome application process merely to keep my skills sharp by flying with a flight instructor. There is no legitimate security reason to impose this rule on me or other certificated private pilots.

The reporting burdens and fees the IFR puts on would-be pilots will actively discourage non-pilots from taking a lesson or two to see if they are interested. I also would suggest that the TSA goes beyond the statutory requirements and good sense with regard to Category 3 pilots. If receiving formal instruction in a Cessna 150 does indeed make someone a potential terrorist threat to hijack a commercial airliner, I submit that receiving informal instruction (which is not regulated) in that same plane would be just as dangerous. How then, will fingerprinting and paperwork for Category 3 pilots make the homeland safer?

Discouraging potential students from seeking instruction and imposing bureaucratic record-keeping and reporting requirements on flight instructors will result in fewer people choosing to work as flight instructors and fewer people taking up flying. The impact will spread throughout the various general aviation businesses, from aircraft manufacturers to fixed base operators.

Please amend the IFR to remove the new burdens it imposes on U.S. citizens and flight schools. Thank you for your consideration.