

The Mermaid, and other qualifying amphibious LSA designs, needs to have an exemption to allow its pilot to change the configuration of the landing gear in flight. This is necessary because the utility and safety of amphibious aircraft (including those on amphibious floats, another common design) depend in large part on said aircrafts' being able to land on a surface other than that from which it took off. (In other words, limiting a landing on land, when takeoff from land was just accomplished, would preclude the pilot from being able to utilize the safety inherent in being able to land on water. The utility of the design would also be considerably diminished, as changes in gear configuration would be legal only on the ground.)

Limiting amphibious aircraft to single-mode ground operations (land only or water only) would negate much of the usefulness and inherent safety of such machines, and would be devastating to the manufacturers and customers of amphibious aircraft and amphibious floats.

With respect to the Mermaid in particular, this aircraft was designed specifically to conform to LSA specifications known at the time of the design. It is, therefore, a perfectly-maximizing design as an LSA aircraft. Relegating it to owner-builder Experimental status would be devastating to the manufacturer, its customers, and the water-flying flight training industry, and diminish safety at the same time. (While it is not good to mistakenly land wheels-down on water, it is a lot worse to be required by regulation to do so, in the event of a forced landing over perfectly good water, surrounded by "unlandable" terrain.)

[Note: The author of this comment is a pilot, rated land and sea.]