

I strongly support the elimination of night cross country flight for a gyroplane Commercial Pilot rating (61.129(d)(3)(iii)). I am a gyroplane CFI and have conducted such night cross country training flights. I find this is a completely unnecessary risk. Many trainer gyroplanes are open cockpit. This restricts altitudes to lower altitudes restricting gliding range significantly making emergency landings a constant concern.

I suggest that the requirement for instrument training for a gyroplane Commercial rating is unnecessary - for the same reasons the FAA is proposing reducing the time from 5 hours to 2.5 hours. Gyroplanes may be especially unforgiving if an unusual attitude is entered in IFT conditions. I would instead make instrument privileges for a gyroplane rating optional. There are currently no gyroplanes that are equipped for IFR anyway!