

The Soaring Society of America respectfully requests delayed implementation of these rules because they become effective for flight training per 49 USC 1552 1552.3(c) in two weeks without adequate provision for compliance. Given the following, we see significant economic impact imposed on general aviation flight schools and individual instructors due to TSA's unconscionable lack of foresight.

As of 5 October 2004:

1. The means for registering with TSA as a flight training provider is not addressed in the TSA rule. TSA "Help Desk" personnel refer flight training providers to a webpage which is not configured for training in aircraft subject to 49 USC 1552 § 1552.3(c)

o The page does not provide a way for a general aviation flight school or individual CFI acting as an independent contractor to register with TSA.

o The page refers to "registration" by/through an FAA FSDO, but Milwaukee FSDO personnel indicate no such registration process exists for general aviation flight schools or individual flight instructors.

o The page also refers to flight school's "FAA certification number," but no certification process exists for flight schools which operate solely under 14 CFR Part 61 and are not subject to Part 141

2. There is no way for a "candidate" to submit a request for TSA approval without providing a TSA-registered flight training provider and the course to be taken; thus, there is no way for candidates to comply with 49 USC 1552 § 1552.3(c) (2) .

3. The TSA rule does not specify procedures for submission of the photograph required by 49 USC 1552.3(c); in concert with the above, no guidance on this point is available online for flight training providers. (The FAQ online at <https://www.flightschoolcandidates.gov/fsindex.html> does not address this issue.)

4. In concert with the above, no one can comply with 49 USC § 1552.3(i)

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