



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798
Telephone (301) 695-2000 • Fax (301) 695-2375
www.aopa.org

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Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590-0001

Re: Docket No. FAA-2006-26661 Pilot, Flight Instruction, and Pilot School Certification

The Aircraft Owners and Pilots Association (AOPA), representing more than 411,000 members, or two-thirds of the nation's general aviation pilots, submits the following comments to the Federal Aviation Administration's (FAA) Notice of Proposed Rulemaking (NPRM) on Pilot, Flight Instruction, and Pilot School Certification published in the Federal Register on Wednesday, February 7, 2007. This NPRM discusses changes to 14 CFR Part 61 and Part 141.

To analyze the proposal, AOPA used and relied on the expertise of the association's staff, the Air Safety Foundation and the general membership. Our members responded with more than 250 comments regarding the proposed changes.

The following recommendations are based on the analysis of the association's professional staff and the views of the members.

Changes Opposed by AOPA

AOPA's most significant concern - Proposed changes to instrument recent flight experience requirements (Proposal No. 30)

Explanation of change: The FAA proposes numerous changes that increase its requirements on pilots for maintaining instrument currency; including the addition of precision and non-precision approaches, a missed approach, holding on multiple fixes, and a one-hour cross-country flight. The FAA also includes new requirements for instrument currency in a flight simulator or flight-training device that would require the pilot to perform and log three hours of instrument experience.

The FAA proposal adds to the approach requirement

Currently, flying six approaches (of any type) is required to meet instrument currency requirements. The proposed change would require that both precision and non-precision approaches be flown for the purposes of meeting instrument currency requirements.

AOPA recommendation: Part 61.57(c)(1)(i) remain unchanged and state "At least six instrument approaches;"

The proposed change may have the unintended consequence of forcing pilots to fly far from their home airport in search of precision or non-precision approaches solely to meet the letter of the regulation. This is very likely in the case of precision approaches as there are fewer than 1,500 instrument landing facilities (ILS) in the United States. Leaving Part 61.57(c)(1)(i) unchanged allows for currency to reflect the type of flying actually done by allowing the pilot to utilize approaches of the type that he or she regularly uses in their normal course of flight activity.

The FAA proposal adds requirements for one holding pattern at a "radio station" and another at an intersection or waypoint

Currently, flying holding "procedures" are required to meet instrument currency requirements. Currently, these holding procedures can be flown as part of an approach procedure flown during a typical instrument arrival. The proposed change would essentially require pilots to fly at least two complete holding patterns – one at a radio station and another at an intersection or waypoint.

AOPA recommendation: Part 61.57(c)(1)(ii) should remain unchanged and state "Holding procedures; and"

The FAA should not place an additional burden on pilots by requiring "one complete holding pattern" at two different types of facilities when holding is operationally rare. The current requirement to practice "holding procedures" is sufficient and does not preclude a pilot from completing one, or more, holding patterns.

Since few pilots have difficulty flying the inbound and outbound legs of a hold (the main components of a holding pattern which are basically straight and level flight), the proposed changes to Part 61.57(c)(1)(ii) would impose additional requirements without any benefit to the pilot community. In addition, the requirement to hold at a radio station – an NDB (Non Directional Beacon) or VOR (Very High Frequency Omni Directional Range Facility) is in direct conflict with the FAA's plan to decommission these navigation aids. If the proposed change, with regard to radio stations, is not modified it will be out of date in a few years.

The FAA proposal adds requirements to fly a one-hour cross country and a missed approach procedure

Currently, pilots are not required to fly any amount of cross-country time or complete a missed approach to meet the instrument currency requirements. The one-hour cross-country flight and missed approach requirements are new.

AOPA recommendation: Part 61.57(c)(1)(iii), as listed in the NPRM, be changed to read "A flight outside of the airport vicinity that includes intercepting and tracking courses through the use of navigation systems,"

AOPA opposes the one-hour cross-country flight time requirement listed in Part 61.57(c)(1)(iii) of the NPRM. The assignment of one hour to the requirement for instrument currency is arbitrary. One hour of flight for the purposes of currency has not been determined to increase

safety or a pilot's proficiency with regard to instrument flying. In proposing this change the FAA is in part reversing its 1995 reasoning as to why the six-hour instrument currency requirement, required prior to 1995, was removed. The 1995 NPRM preamble stated that "... the six hours of simulated instrument flight may be flown largely in straight and level flight, which probably is relatively unchallenging to most instrument-rated pilots and does not significantly contribute to maintaining instrument proficiency." The same will be true with a one-hour requirement. In essence, the FAA is creating an additional burden on pilots that will not provide a safety benefit to the pilot community.

The proposed change is not specific enough and raises questions about the intent of the regulation. Pilots are already questioning if published departure and standard terminal arrival procedures must be flown, if the six approaches must be flown during the one-hour cross country, and which definition of cross country (at least 50 nautical miles or point to point) will be used for the purpose of meeting this requirement.

Because currency should reflect the type of flying done by the pilot, AOPA objects to the missed approach requirement outlined in the NPRM. If a pilot flies six approaches in instrument meteorological conditions (IMC), and does not need to perform a missed approach during these flights, the FAA should consider the pilot to be instrument current. As a matter of operational procedure, pilots review the missed approach procedures as part of their preparation for the approach.

The FAA's proposed requirements for the use of flight simulators (FS), flight training devices (FTD) and personal computer aviation training devices (PCATDs) in instrument currency go beyond current requirement in actual aircraft

Currently, the regulations do not allow the use of these devices for the purpose of meeting instrument currency requirements. The proposed change would allow the use of these devices to meet instrument currency requirements if the pilot performed and logged three hours in these devices and completed the list of tasks outlined in the regulation that go well beyond what is required in an actual aircraft.

AOPA recommendation: Part 61.57(c)(2) through (4) should reflect the airplane instrument requirements as currently listed in Part 61.57(c)(1) which includes six instrument approaches, holding procedures and intercepting and tracking courses through the use of navigation systems matching what is required to be performed in an aircraft.

AOPA objects to the onerous hour and task requirements proposed for FS, FTD, and PCATD prescribed in the NRPM under Part 61.57(c)(2) through (4). While the association is in favor of alternate means of meeting instrument currency requirements, we believe that these requirements should mirror those currently required when using an aircraft to meet instrument currency requirements.

Per Part 61.51(g)(4) an authorized instructor must be present during a simulated flight in a FS, FTD or PCATD. The presence of a fight instructor will ensure that pilots choosing to maintain instrument currency through the use of a FS, FTD or PCATD are competent to fly in IMC without the additional requirements outlined in the proposal.

The FAA proposal to standardize the definition of “cross country” by changing from “of at least” to “more than” has unintended negative impact (Proposal No. 52, 53, 54)

Explanation of change: Proposes to change the definition of cross-country to be a distance of “more than 50 nautical miles.” Currently, the definition of a cross-country used for pilot certification purposes in Part 61 is “of at least 50 nautical miles.”

AOPA recommendations: Part 61.1(b)(3)(ii)(B) be changed to read “That includes a point of landing that was at least a straight line distance of 50 nautical miles from the original point of departure.”

There will be unintended negative consequences of the proposed wording change from “at least 50 nautical miles” to “more than 50 nautical miles” as listed in the NPRM. For many pilots the “cross-country” airport is not a choice between an airport that is 50 or 51 nautical miles away, the choice is between an airport that is 50, 75, or 100 miles from the departure airport. These extra miles directly translate into additional costs for the pilot pursuing various levels of pilot certificates and rating and provide no additional training benefit, as the skills required to fly 50 miles are the same needed to fly 75 miles.

To address the FAA’s desire for standardization, AOPA suggests the above modification to Part 61.1(b)(3)(ii)(B).

This change will negate the need to modify various regulations throughout Part 61 and Part 141.

The FAA proposal to add the term “current” to every reference in Part 61, when referring to legally exercising their pilot privileges creates confusion (Proposal No. 3)

Explanation of change: This change would add the word “current” along with the existing verbiage of “valid” and require that a pilot’s certificate, rating, and authorizations meet both these definitions in order for a pilot to legally exercise their privileges. The FAA intends to define “current” as meeting the appropriate recent flight experience requirements for each flight and “valid” as a certificate that has not been surrendered, suspended, revoked or expired.

AOPA recommendation: The FAA should not include the terms “current” and “valid” throughout Part 61 and should not attempt to apply them to the various certificates, ratings and authorizations.

Including the terms “current” and “valid” throughout Part 61 will lead to confusion as the definition of these terms, especially current, varies based on the certificate, rating, authorization, etc that is being exercised. A pilot who is “current” for one particular flight (ex: solo flight) on any given day may not be “current” for another particular flight (ex: carrying passengers) on the same day. Even the FAA acknowledges in the NPRM that the proposed change may exacerbate confusion within the pilot community. Pilots understand the current regulatory requirements for exercising privileges; there is no need to attempt to further explain these requirements.

In addition the proposed language could imply that pilots will have to carry their logbooks on every flight in order to provide proof of currency during a ramp check. Beyond the student pilot community, pilots are not required to carry their logbooks on flights and doing so can needlessly expose these critical pilot logs to loss, theft or damage. Also, with the increasing popularity of computer-based logbooks, this may not be possible for some pilots.

The FAA proposes unnecessary requirement for a “view limiting” device to receive credit of 10 hours of PCATD time towards an instrument rating (Proposal No. 38)

Explanation of change: Proposes to credit 10 hours of PCATD training toward the instrument training requirements and requires that pilots wear a view-limiting device during this 10 hours.

AOPA recommendation: Part 61.65 be modified to include newer flight training devices and instrument training time already recognized by the FAA and should be included in this regulation.

AOPA recommendation: Part 61.65(h) (4), which requires the use of a view-limiting device, be deleted.

The FAA proposal should include new technology - AATD, BATD, and PCATD

AOPA understands that the FAA may be doing away with the term PCATD and replacing it with basic aviation training devices (BATDs) and advanced aviation training devices (AATDs). Currently, via a letter from the FAA, operators of AATDs are allowed to count 20 hours of AATD time toward the instruments training requirements. Ten hours of BATDs time can be counted toward the instruments training requirements. This proposed change should reflect that up to 20 hours, if accomplished in AATD, could be credited towards the instrument training.

The requirement for airman to wear a view-limiting device during simulated flights on an AATD, PCATD or BATD is redundant and unnecessary as these devices can simulate instrument conditions.

The FAA proposes to broaden changes regarding falsification of applications, certificates, logbooks, reports, or records which could have unintended negative impact on pilots (Proposal No. 34)

Explanation of change: Proposes to broaden Part 61.59 to include an “incorrect” statement on an application or in a logbook entry as the basis for the suspension or revocation of a pilot certificate. The current regulation only addresses fraudulent or intentionally false statements as the basis for certificate suspension or revocation.

AOPA recommendation: Part 61.59 should remain unchanged

The association strongly opposes purposeful omissions or falsifications on airmen applications. However, the proposed change to Part 61.59 is significant and could adversely affect pilots for relatively inconsequential and unnecessary reasons. The proposed change includes language that makes any "incorrect statement" or "entry" on an application or in a logbook a basis for

"suspending, revoking, or denying an airman certificate, rating, or authorization." Currently "fraudulent or intentionally false" statements are required to be at least material misstatements, and would not include irrelevant incorrect statements. Under the proposed change a pilot could respond to a question about how many hours he or she has by answering "500." If the pilot actually has "505 hours" the statement of 500 hours would be incorrect and a basis for "suspending, revoking, or denying an airman certificate, rating, or authorization" even though it might not even be material.

The FAA proposes a new requirement for 10 hours of helicopter cross-country flight time for an instrument rating in a helicopter (Proposal No. 37)

Explanation of change: Proposes to add a requirement for helicopter pilots seeking an instrument rating to conform to the International Civil Aviation Organization (ICAO) standard. The proposal includes 10 hours of cross-country flight time in a helicopter for the purposes of getting an instrument rating in a helicopter. Currently, Part 61.65(d)(1) does not have a cross-country requirement for helicopters.

AOPA recommendation: *Part 61.65(e)(1,) as listed in the NPRM, be modified to read "Fifty hours of cross-country flight time as pilot in command; and"*

AOPA opposes this proposed change because it would pose a serious financial burden on helicopter pilots, without any increase in the value of training received, in the name of standardization. Currently, applicants for an instrument rating must have 50 hours of cross-country experience as pilot in command. This time maybe accumulated in any aircraft the pilot is qualified to log pilot in command time, allowing for previously accumulated flight in other makes of aircraft. This allowed a pilot to use cross-country flight time accumulated in airplanes, which are generally less expensive to operate to be counted towards the time required for the instrument rating. We see no benefit to requiring a specific amount of cross-country time in helicopters since the principles of cross-country navigation are the same for airplanes and helicopters.

The FAA's proposed changes to instrument training, solo and time requirements for a commercial certificate need to be modified to address pilot concerns (Proposal No. 57, 59, 64)

Explanation of change: Proposes to add a requirement to wear a view-limiting device while meeting the instrument training requirement for a commercial certificate, adds a 5 hour instrument training requirement for helicopters pilots, and allows the solo flight requirements of the commercial certificate to be completed either solo or as pilot in command.

The FAA proposal to require a "view-limiting device" should be expanded to include providing credit for flights in actual instrument meteorological conditions

AOPA recommendation: *Part 61.129 (a)(3)(i) and (b)(3)(i) be changed to read "10 hours of instrument training using a view limiting device, or flight in instrument meteorological conditions, including instrument flying, partial panel . . . (remaining proposed language unchanged)"*

Flight in actual instrument condition should be added to the subparts of Part 61.129, which address the instrument training requirements necessary for a commercial certificate. This change would allow pilots to meet these requirements by flying in IMC or wearing a view-limiting device.

AOPA also supports a change in language to include flight in IMC in other portions of Part 61.129 where an instrument-training requirement is listed.

The FAA proposal to add five hours of additional training solely by reference to instruments for helicopter pilots is unnecessary

AOPA recommendation: Part 61.129(c)(3)(i), which requires five hours “on the control and maneuvering of a helicopter solely by reference to instruments . . .,” be deleted.

AOPA opposes the added requirement for five hours of training “on the control and maneuvering of a helicopter solely by reference to instruments.” While the proposed change does allow for use of a flight simulator, flight training device or PCATD, the requirement for five hours of training in a helicopter creates a burden for those pilots who only have access to VFR equipped helicopters and no access to a FS, FTD or PCATD.

The FAA proposal to modify solo aeronautical experience requirement for the commercial cross-country flights should be expanded

AOPA recommendation: Part 61.129(a)(4) be changed to read “10 hours of pilot in command time in a single-engine airplane”

The proposed changes to solo aeronautical experience should be expanded further and modified to pilot in command time (PIC). This would allow the required flight time to be dual received from an instructor, PIC with passengers or solo. The 10 hours required could be accomplished as part of other flights already authorized for private pilots, thus reducing the financial cost of training with no loss of safety.

AOPA supports this change in other portions of Part 61.129 that require solo/acting as pilot in command time for other categories of aircraft.

The FAA proposal to ensure that only the appropriate flight instructors give instrument instruction to commercial and ATP applicants needs clarification (Proposal No. 73)

Explanation of change: Proposes to add language to clarify the intent of Part 61.195(c), which would state that only a flight instructor with an instrument rating on their instructor certificate can give the required instrument training for the issuance of a commercial or ATP certificate.

AOPA recommendation: Part 61.195(c) be changed to read, “A flight instructor who provides instrument training for the issuance of an instrument rating, a type rating not limited to VFR, or the instrument training required for commercial pilot and airline transport pilot certificates must hold an instrument rating on his or her pilot certificate and flight instructor certificate that is

appropriate to the category of aircraft for the training provided.”

The proposed change to Part 61.195(c) adds clarity to the intent of the existing regulation. Since instrument flight instructor certificates are specific only to category, and not class, AOPA recommends the wording of Part 61.195(c) be changed by removing the reference to “class.”

The FAA proposal to allow the logging of additional pilot in command time by commercial and airline transport pilots (ATP) needs clarification (Proposal No. 26)

Explanation of change: Intends to allow a commercial or ATP rated pilot who is supervising another pilot, and is performing the duties of pilot in command (PIC), to log this time as such. This expands the conditions under which a commercial or ATP rated pilot may log PIC time.

AOPA recommendation: *More clarity is needed in the language used in the proposed change and the intent given in the NPRM. The intent, if we understand it correctly, would be positive, however, AOPA is afraid that the proposed change as stated in the NPRM without further clarification would result in confusion within the pilot community over who can log pilot in command time and under what conditions.*

AOPA members continue to have questions on appropriately logging PIC time. AOPA suggests that a matrix be added to Part 61.51(e), Logging pilot-in-command flight time, outlining the conditions under which a pilot may log PIC time, including time spent as acting as a safety pilot.

Changes Supported by AOPA

The FAA proposal to extend the duration of student pilot certificates should coincide with other FAA rulemaking to extend the duration of certain medical certificates (Proposal No. 5)

Explanation of change: Extends the duration of a student pilot certificate for people under the age of 40 to 36 calendar months to match that of the medical certificate.

AOPA recommendation: *Support the change, however this change should also coincide with other FAA rulemaking to extend the duration of first and third class medicals.*

The proposed change to Part 61.19(b), which extends the duration of a student pilot certificate, corrects the “gotcha” where a medical certificate could be valid for 36 months (under the age of 40) and a student certificate for only 24 months even though both certificates are issued on the same piece of paper. This change will streamline operations for the FAA, student pilots and instructors.

The FAA has released an NPRM (FAA-2007-27812) for public comment that proposes to extend the duration of the first and third class medical certificates for those under the age of 40 to 12 months and 60 months respectively. The change to the duration of the student pilot certificate should appropriately reflect the outcome of that NPRM.

The FAA proposal to remove expiration dates from flight instructor certificates should include a “paperless” renewal process (Proposal No. 7)

Explanation of change: The flight instructor's certificate would not be issued or have an expiration date. The privileges of the flight instructor certificate will need to be renewed within the previous 24 months before an instructor can exercise their privileges by the same methods in place today to renew certificates.

AOPA recommendation: *Accept the change and explore options of a "paperless" renewal process.*

With this change the FAA acknowledged an AOPA Air Safety Foundation petition from 1999. In addition to decreasing paperwork for both pilots and the FAA, this change clarifies that taking either a check ride for one of the existing privileges or for a new privilege can renew an expired certificate.

The FAA should expand this change and allow for a paperless renewal process for certificated flight instructors.

The FAA proposal to remove the social security number requirement is supported by AOPA (Proposal No. 14)

Explanation of change: Pilots would not be required to provide their social security number when requesting a replacement certificate or knowledge test report.

AOPA recommendation: *Accept the change.*

This change deletes the requirement that a person furnish their social security number to the FAA. This change provides clarity to the pilot community, since by law the FAA cannot require a person to provide their social security number.

The FAA proposal to allow more military pilots to apply for FAA certificates is supported by AOPA (Proposal No. 41)

Explanation of change: Removes the requirement that military pilots be on active flying status within the past 12 months to qualify for an FAA certificate or rating.

AOPA recommendation: *Accept the change.*

AOPA supports the proposed change allowing military pilots, who are off active flight status beyond 12 months, to apply for FAA certificates. This change would allow for more retiring or separated military pilots to obtain FAA certificates.

The FAA proposal to add military flight instructors needs clarification (Proposal No. 42)

Explanation of change: Proposes to allow military flight instructors to get an FAA flight instructor certificate based on their current military credentials and the successful completion of an FAA written exam.

AOPA recommendation: Part 61.73(g)(3)(I,) as listed in the NPRM, be changed to read "A graduation certificate showing that, within the preceding three calendar months, the person has successfully completed an approved flight instructor refresher course; or passed a practical test as prescribed in §61.183(h) of this part that is appropriate for the flight instructor rating sought;"

AOPA supports the idea of having more high-time pilots active in the flight instructor community. However, we do recognize that there may be challenges when pilots transition to a different flight operations environment (i.e., from military to civilian) and the convenience of having multiple ways of converting a military instructor certificate. To allow for flexibility, and help prepare U.S. military instructor pilots to be successful civilian flight instructors, AOPA proposes that military flight instructors be given two paths to obtaining a CFI: complete a flight instructor refresher clinic or pass a practical test.

The FAA proposal to clarify the commercial training requirements for day and night commercial cross-country flights should be expanded to include IFR and IMC flights (Proposal No. 62)

Explanation of change: Clarifies that the day and night cross-country commercial training flight requirements can be done under visual or instrument flight rules.

AOPA recommendation: Expand change to include flights under IFR and in IMC.

AOPA supports the FAA's efforts to allow the required day and night cross-country flights to be conducted under visual or instrument flight rules. This will decrease confusion within the pilot community about this requirement. AOPA would like to see the FAA expand its intent to include, not only flights under IFR, but also flights in IMC.

The FAA proposal to include complex multiengine airplane as an option for the commercial requirements should be expanded (Proposal No. 99)

Explanation of change: Training in a complex multiengine airplane would count towards the training requirements of the commercial single-engine certificate issued per Part 141.

AOPA recommendation: Expand this change to include the commercial training requirement listed under Part 61 as well.

The FAA is incorporating a change requested by AOPA in 1999 that allows the complex single-engine airplane training requirements for the commercial pilot certificate issued under Part 141 to be completed in either a complex single-engine or complex multiengine airplane. AOPA would like to see the FAA expand this change to include commercial training under Part 61.

The FAA proposals to include night vision goggles should include user input (Proposal No. 1, 2, 16, 24, 29, 32, 33, 75, 78)

Explanation of changes: Defines night vision goggles and night vision goggle operations, adds provisions for logging flights with night vision goggles and endorsement, training and currency requirements.

AOPA recommendation: *Accept the changes and incorporate any comments received from civilian users of NVGs.*

AOPA supports the FAA's efforts to include night vision goggles (NVGs) in the regulations. However, AOPA defers to frequent users of NVGs to comment on the full extent and ramifications of the proposed changes.

AOPA Recommendations for Additional Changes to Part 61

AOPA recommends replacing the FAA medical for recreational pilot certificate with "driver's license" requirement to meet medical standard

AOPA recommends that the FAA eliminate its requirement that pilots hold a valid FAA medical certificate when exercising the privileges of a recreation pilot certificate. Instead the FAA should permit the use of a valid and current U.S. driver's license in lieu of an FAA medical certificate when exercising these privileges.

For recreational pilot privileges, AOPA members strongly support the use of a valid and current U.S. driver's license in lieu of an FAA medical certificate. The privileges of a recreational pilot are limited to allow for only daytime, visual flight rule operations that are non-commercial. Recreational pilots may only carry one passenger at a time, cannot act as pilot in command of flights that exceeds 50 nautical miles from the departure point, and are limited to small, 180hp or less, aircraft.

A valid U.S. driver's license establishes an acceptable minimum medical standard for the recreational pilot. Applicants are generally required to attest to a basic level of health and minimum vision standard.

An analysis of the AOPA Air Safety Foundation Accident and Incident database reveals an extremely low number, 1.9 percent, of accidents have any medical factors contributing to the accident and the accidents caused by medical incapacitation were *not* attributable to conditions that could have been uncovered or predicted by a medical examination.

Even the FAA, in its sport pilot final rule, said "medical conditions are not a significant cause of accidents in aircraft that are used for sport and recreational purposes."

The FAA should take the next logical step and extend the "driver's licensed medical" to pilots exercising recreational pilot privileges.

AOPA recommendation: *Part 61.23 (a)(3)(ii) which states, "When exercising the privileges of a recreational pilot certificate;" be deleted.*

May 8, 2007

AOPA recommendation: Part 61.23(a), which states, "A valid and current U.S. driver's license is required when exercising the privileges of a recreational pilot certificate."

AOPA recommends modification of training and practical test requirements for the commercial and flight instructor certificates to include use of TAA

Currently, an applicant for a commercial pilot certificate must acquire 10 hours of training in a complex aircraft as outlined in 61.129(a)(3)(ii) and 141 Appendix D (b)(1)(ii). Applicants must also provide a complex aircraft for the practical test for the issuance of both an initial commercial single engine and single engine flight instructor certificate.

AOPA recommendation: With the industry trending toward increased use of Technically Advanced Aircraft (TAA), not all of which meet the complex aircraft definition, the FAA should change its requirements to allow for the use of TAA during the commercial and flight instructor practical tests. AOPA asks that the FAA work together with industry to determine a way to maintain the current level of safety and incorporate a new generation of aircraft into the training and testing requirements.

Summary

The association recommends that the FAA adopt AOPA's proposed changes to its Part 61 NPRM on Pilot, Flight Instruction, and Pilot School Certification. Part 61 requirements serve as the foundation of FAA's regulation and oversight of pilots and it is important that the FAA rely on AOPA's expertise and the expertise and experience of pilots who took the time to provide input on this important regulation. The proposed changes will ensure that the FAA's final rule is clear and helps the FAA maintain safety without unduly burdening pilots.

Sincerely,



Robert E. Hackman
Senior Director
Regulatory Affairs