



June 9, 2009

Mr. John Allen  
Director, Flight Standards Service AFS-1  
Federal Aviation Administration  
800 Independence Ave., SW  
Washington, DC 20591

Dear Mr. Allen:

The general aviation community represented by the Aircraft Owners and Pilots Association (AOPA), the Experimental Aircraft Association (EAA) and the General Aviation Manufacturers Association (GAMA) would like to express our continued support of the sport pilot rule (14 CFR Part 61 Subpart J). Together we represent all aspects of general aviation, including pilots, aircraft owners, amateur builders, and aircraft manufacturers.

The general aviation community believes that this certificate removes or diminishes many barriers to pilot certification, without compromising safety. To further the growth of sport pilot, our associations believe it is imperative that prospective private pilots be able to apply training they have received for a sport pilot certificate toward the requirements to obtain a private pilot certificate.

The flight training regulation as currently written for the sport pilot certificate has created confusion among the pilot community regarding the applicability of training time received from a Sport Pilot Instructor while pursuing a sport pilot certificate. As stated above, we believe that any flight training from an authorized instructor (Subpart K), including a sport pilot instructor, accrued while pursuing a sport pilot certificate should count toward the aeronautical experience required for a private pilot certificate under Part 61.109.

We are asking the FAA to clarify the sport pilot rule to clearly reflect this position so as to eliminate interpretation and provide complete clarity as to which training can and cannot be applied to the hours required for a private pilot certificate.

Thank you in advance for your support. At your convenience, we would like the opportunity to further discuss with you our continued support of the sport pilot movement and potential strategies to clarify the confusion surrounding this issue.

With your assistance, we look forward to the continued growth of the sport pilot population.

Sincerely,

Craig Spence  
Vice President  
Regulatory Affairs  
AOPA

Sincerely,

Jens Hennig  
Vice President  
Operations  
GAMA

Sincerely,

Earl Lawrence  
Vice President  
Industry and Regulatory Affairs  
EAA