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FAA-1999-5836

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July 16, 1999

5450 E. Voltaire
Scottsdale, AZ 85254

FAA-99-5836-22

FAA Rules Docket AGC-10
800 Independence Avenue SW
Washington, DC 20591

Dear Sir or Madam:

I am writing in regard to 14 CFR's 61.25, 63.16, 65.16, Change of Name.

I am writing as a public citizen, although I work in an FAA Flight Standards District Office as an Aviation Safety Technician.

In relating the above-referenced rules to 14 CFR **61.197(a)(2)**, it appears to me that any person may simply mail personal documents to FAA Airman Certification Branch to have their name changed due to a change in marital status or some other legal process. The name change is processed by Airman Certification without personal contact and verification of the applicant's identity.

However, a flight instructor who applies for renewal of his or her certificate under 61.197 must present records or documents to an authorized FAA Flight Standards Inspector, and identification of the applicant is verified in person. FAA Order 8700.1, Volume 2, Chapter 11, Section 2, Paragraph **5D**, lists acceptable forms of identification to establish the applicant's identity.

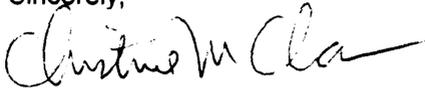
Since positive identification of the airman is so important, I would like to propose that 61.25, 63.16 and 65.16 be amended, as practicably as possible:

"An application to change the name on a certificate issued under this part must be presented to an authorized FAA Flight Standards inspector and accompanied by the applicant's . . ."

Positive identification of the airman may then be accomplished at the FSDO. This would also be more equitable to flight instructors who do not reside near their FSDO yet must appear in person to renew their certificate.

Thank you for your attention to this matter.

Sincerely,



Christine M. Clark