

Russell Burges)  
637A Coronado Ave.  
Prescott, AZ 86301

DEPT OF TRANSPORTATION  
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August 09, 2000

U.S. Department of Transportation Dockets,  
Docket No. (FAA-2000-7623) ← 236  
400 Seventh Street SW., Room Plaza 401  
Washington, D.C. 20590

Dear Sir or Madam:

I understand that Presidential Executive Order No. 12866 requires the FAA to review its regulations to determine, among other things, if they "are in the public interest."

I hereby request a change to Title 14, Code of Federal Regulations, Part 141 Appendix D., 4(b)(1)(ii) which states, "10 hours of training in a **single-engine** airplane that has retractable landing gear, flaps and a controllable pitch propeller, or is turbine powered."

**Proposed Amendment:**

The change I seek would effectively change 14 CFR 141, D, 4(b)(1)(ii) to read: "10 hours of training in an airplane that has retractable landing gear, flaps and a controllable pitch propeller, or is turbine powered." This would allow students to obtain these 10 hours of experience in a single-engine or multi-engine complex airplane.

**Explanation:**

The current rule causes an applicant for a single-engine add-on to a multi-engine commercial certificate to log 10 hours of training in a single-engine complex airplane. Prior to this change, 14 CFR 141 required an applicant to log 10 hours of flight instruction in *any* complex airplane, not just single-engine complex.

Aeronautical experience required for single-engine commercial pilot rating obtained under provisions of 14 CFR 61-129 (a)(3)(ii) may be met using either single-engine or multi-engine complex airplanes. There is no reason to require different experience under 14 CFR 141.

This request is in consonance with an existing draft notice of proposed rule making which has taken significant time for issuance. The economic burden on students should be relieved as soon as possible.

Students enrolled in Commercial Pilot Certification courses may already have significant hours in a complex multi-engine airplane prior to seeking a single-engine add-on to the multi-engine commercial pilot certificate and have will gained considerable knowledge and skill in operating complex aircraft. The current rule places a new and significant economic burden on the student with no increase of flight training or flight safety.

Sincerely,



Russell Burgess