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2100 Charleston Place
Hyattsville, Md 20783
April 17, 2002

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington D.C 20590

Docket No. FAA-2002-11580 -36

Comments on Special Federal Aviation Regulation (SFAR 94)

I am a CFII and manager of a flying club at College Park Airport, Md. The flying club has operated at College Park Airport for the past 22 years with active pilots and aircraft as many as 25 and 3 respectively. In the year 2001 the number of flying members varied from 12 to 15 and we had two aircraft most of the year. The club flight operations averaged fourteen hours monthly until Sep 11, 01. Since reopening of airport operations February 23, 02, we've had eight active pilots and one aircraft. They have flown eleven hours in that 53 day period. That works out to 6.25 hours per month, compared to 26 hours per month by that one plane during the same 53 day period in 2001. Since the reopening of the airport, the two CFIIs with the club have been unable to give any instruction.

Reference SFAR 94, Section 3 (b) (1) (ii) - Current medical certificates; Current Federal Aviation Regulations authorize CFIs without medical certificates to give flight instruction, in flight, in all geographical areas of the USA (except the Washington D.C. area). SFAR 94 does not allow flight instruction by CFIs without medical certificates in the Special Flight Rules Area. Request the medical certificate requirement for CFIs in the very limited areas between the three SFRA airports and their respective closest SFRA border be eliminated.

An example of how the medical certificate requirement affects instructors and pilots;

A pilot friend from outside Washington area visits me and desires to obtain a Biennial Flight Review or an Instrument Competency Check. I have no medical certificate and he cannot be pilot in command because he hasn't met the requirements of SFAR 94. There is no way to fly aircraft from College Park Airport to the border of the Special Flight Rules Area,, where we could proceed in the Class B air space to an appropriate training area.

Reference SFAR 94, Section 3 (b) (1) (iv) - A list containing the make, model, and registration number of each aircraft the pilot intends to operate to or from the airport;

This requirement prevents any growth in numbers of aircraft based at the airport. It also will likely reduce the numbers of aircraft at the three airports in the Special Flight Rules Area. The requirement that pilots be tied to certain identified aircraft implies that both the pilot and the aircraft require controls. It would appear to me that it is the pilot, not the aircraft that can cause the damage. Request relaxation of the rule to tie the pilot to certain specifically identified aircraft.

An overall general request would be to revise the Special Flight Rules Area boundary to exclude the College Park Airport, similar to the Freeway Airport exclusion.


Don Drago, CFII
& Aviation Club Mgr.

Cy: Manager, CGS