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Simulator & Instrument Training Center Inc.

7240 HAYVENHURST AVE Suite 231

Van Nuys, CA 91406

(818) 988-7224 OFFICE

(818) 988-7171 FAX

EMAIL IFRVNY@AOL.COM

The Administrator
Docket Management System
U.S Department Of Transportation
Room Plaza 401
400 Seventh St.
SW. Washington 20590-0001

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OFFICE OF THE ADMINISTRATOR

Re: Notice Of Proposed Rule Far Part 60
Simulation Device Initial & Continuing Qualification.

Feb.12, 2003

Dear Administrator:

As a professional Flight Instructor for over 25 years I have instructed extensively and given over 5,000 Hours in FSDs/FTD and 10,000 in airplanes.

The FSD has been the foundation to building pilot instrument skills, CRM and discipline. Additionally, the FSD/FTD promotes safety and in many cases allows the Multiengine pilot the opportunity to experience emergency procedures often too dangerous to practice in the actual aircraft.

The FSD is a superior piece of training equipment over the recently approved PCADs in the General aviation training market.

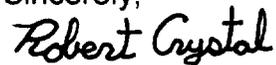
Part 60 is unrealistic in its treatment of the FSD. The purposed rules are treating FSD's/FTD as if they were under FAR 142 training centers, which are using type specific Simulators. Type specific Simulators as you know must duplicate every aspect of the aircraft including motion. FSD's are generic and used more as procedural trainers, and meet the FAR qualifications and needs quite well for General aviation training proficiency and recurrency. In fact the administration should think more about promoting an increase in the use of FTD/FSD in training under Part 141 & 61 flight training, rather than attempting to limit or disqualify their use.

Additionally if the FAA should impose any changes that would disqualify or limit A presently approved FSD/FTD or grand fathered FSD/FTD; It would create a financial hardship, and possible cause quality flight training centers that use FSD's/FTD to go out of business. Never the less the increased cost to the pilot if he is forced to do all training in the aircraft. FTDs are the modern way to train, they are a time safer and the transfer of learning is greater and safety is not compromised.

Additionally the FAA doesn't have the manpower to do the inspections that would be imposed in the continuous qualification process, which would again have a financial burden on the 141 or 61 operator with loss of use while waiting for approval.

As you can see these are just a few reasons why, I urge the administration to take a closer look and rethink their position on making any changes as to either the use or qualifications of FTDs/ Flight Simulation Devices.

Sincerely,

A handwritten signature in black ink that reads "Robert Crystal". The signature is written in a cursive, slightly slanted style.

Robert Crystal
President,
Simulator & Instrument Training Center, Inc.