

This proposal is restrictive to small operators, aircraft renters and flight schools.

There is no statistical basis in the proposal that demonstrates a decrease in accidents will result.

To promote aviation and serve the community a renter of aircraft, or a flight school should always be able to give an aircraft ride. The current regulations create an exception that permits such rides. Instead of becoming more restrictive under this provision the regulations should be amended to expand the exception.

I suggest that the regulation be expanded to permit renters of aircraft with 6 or less seats to give demonstration rides in the aircraft. (The 25 mile rule would apply.)

I also suggest that an instructor should always be permitted to give introductory flights and/or sightseeing rides in an aircraft he is qualified to instruct in. The 25 mile rule should apply to flights that are not instruction.

To further clarify the current rules any flight in an aircraft with 6 or less occupied seats, with an instructor performing the duties of instruction and with all occupants holding at least a student pilots certificate should be considered instruction and not air transportation. The 25 mile rule would not apply to such flights because they are instruction and not sight seeing.

An additional clarification should allow any flight for which the pilot receiving instruction is properly rated and is paying for the flight to be considered instruction and not air transportation regardless of whether there are other occupants. This should still be permitted if the pilot receiving instruction is not current.