

Dear Sir or Madam,

I am writing to express my concern to several parts of the IFR outlined in docket TSA-2004-19147.

I am a Canadian citizen, and have been a lawful permanent resident of the United States for more than a decade. I am also, as a person who is planning to seek a pilot's license in the future, in the class of people directly affected by this rule.

It is my belief that the rule being promulgated by TSA will have a negative effect on the safety of General Aviation by significantly increasing the cost of recurrent training, and it will not have a measurable effect on the safety of aviation or national security for several reasons.

1) The IFR will have a negative effect on General Aviation Safety

Frequent studies by the NTSB, FAA, NASA and other agencies show that there is a direct correlation between the safety of pilots and the frequency and degree of recurrent training they receive. This is why airlines typically require recurrent training of their pilots at 6-month intervals, and have a correspondingly low rate of accidents.

The safety of general aviation is likewise related to the degree of instruction and recurrent training pilots receive. It is my belief that this IFR, by increasing the cost of recurrent training and instruction for new ratings, will discourage pilots who are affected by the rule from seeking more frequent recurrent training. Additionally, the rule will raise the cost of both primary and recurrent flight training for all students, by increasing the administrative burden on flight schools who provide this training.

2) The IFR will not have a measurable effect on national security.

Terrorists who wish to launch attacks against the United States have a number of options available to them. They can seek un-approved flight training from other pilots, they can seek flight training in foreign countries, or they can launch their attacks with textbook knowledge of aircraft but no formal flight training at all. In the case of terrorists who are sponsored by nation-states, the most obvious route to training terrorist pilots under the new rule would be using the airline facilities and personnel of those nations' airlines. None of these methods of obtaining foreign or "ad-hoc" flight training would be affected by the new IFR. Thus, the effect of the rule on actually stopping terrorists is negligible, while the burden on law-abiding non-citizen pilots who are seeking new or recurrent flight training is much higher.

For these reasons, I urge DOT to reject or revise the IFR, which provides negligible benefit for actually interdicting terrorists, and imposes significant burdens on both lawful aliens who seek flight instruction and on the flight schools that provide them.

Sincerely,
Tammy Cravit