

I have three main points.

1. Aircraft training for aircraft under 12,500 lbs is not dangerous
The regulation of alien pilots who fly aircraft under 12,500 lbs is unnecessary. Small aircraft have already been determined not to be a threat to tall buildings or nuclear facilities, and carry the same amount of danger as a delivery vehicle for chemical or biological agents as a small car. Further, practical unregulated alternatives to flight training in an aircraft exist. I hear many stories of student pilots who have been playing flight simulator games for years who are able to takeoff and land the plane on their first "real" lesson. These students are just as likely to be able to control a 747 as anyone with a Private Pilot Certificate. It will be impossible to regulate the sales of Microsoft Flight Simulator and all similar programs. This part of the rule was NOT required by Congress. I believe that the requirement for regulation of training in small aircraft should be eliminated.

2. Treat US Permanent Residents the same as US Citizens
US Permanent Residents share almost all privileges of US citizens - the exceptions being voting, jury duty and the like. In most cases, US Permanent Residents have lived in the US for years. They have made a permanent commitment to the US that is at least as strong as US citizens - if not stronger. Further, these Permanent Residents have already been security-checked through the USCIS/INS application process. None of the September 11 hijackers were US Permanent Residents. I believe that US permanent residents should be treated the same as US citizens under the new rule, with their green card or I-551 stamp being necessary proof for starting training.

3. There should be an exemption for Introductory Lessons
Every day, thousands of potential students walk into a flight school asking about flight training. In most cases, the school suggests that they take an Introductory Lesson - a 1/2-hour or one hour flight from the left seat with an instructor - prior to beginning formal training. This serves several purposes: to make sure that the student is interested enough to continue training, to introduce the student to the instructor and school, and as a marketing device for schools to bring in students. Many of these prospective students will begin training at this school or elsewhere, and many will not begin training at all. Some receive a gift certificate for this flight and choose not to take up formal instruction.

The documentation requirements under this new rule are excessively burdensome for Introductory Lessons. Very few of these prospective students are likely to be carrying their passport or birth certificate when they go to the airport. I know that the documentation requirements would likely have kept me from taking the lesson and starting flight training at all.

I would propose that an exemption be made for a one-time lesson for ANY student (citizen or alien), instructor and school combination. This lesson should be required to be "primary training" or "pre-solo training for a Private Pilot Certificate". Once a student finds a school and instructor that they like, they should THEN file all of the paperwork required (proof of citizenship/resident status or application to TSA).