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Date: September 24, 2004

From: Matt Hapgood  
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Chapel Hill, NC 27514

To: DOT, TSA, and Office of Information and Regulatory Affairs  
Office of Management and Budget  
Attention: DHS-TSA Desk Officer  
Via Fax (202) 395-5806 and (202) 493-2251

Re: Docket No. TSA-2004-19147 ~ 26  
RIN 1652-AA35  
Flight Training for Aliens and Other Designated Individuals

Dear Sir or Madam,

I am a small business in the process of establishing a Part 142 Flight School. TSA-2004-19147 places additional burdens on my small business that will be onerous and will have detrimental financial impacts. Fingerprinting, internet connections, administrative efforts and record keeping will all add significant costs to my business.

Although I believe in the need for aviation security, these requirements are overly burdensome and expensive given other alternatives. For instance, if all information is transmitted to TSA, why then is it necessary for my flight school to store such records – why can't the TSA store the records? Is this really a security issue? If so, it's not a very secure measure - what if my records get destroyed in a flood or fire, or a terrorist destroys them? As for fingerprinting – do my employees need to become trained in fingerprinting, and how to identify fake fingerprints?

This rule places a large administrative and financial burden on flight schools. Its cost is out of line with the benefits, especially given possible alternatives. In summary, implementation of this rule needs to be delayed until there has been adequate (i.e. "standard") time for flight schools to digest the information and provide feedback and possible less burdensome processes.

Sincerely,  
Matt Hapgood