

1. For aliens who are already certified pilots, the rule should clarify that flight reviews needed to maintain privileges are exempted from the requirement. Flight reviews are not new flight training that adds to existing skills, but simply a check on whether existing proficiency standards are being met. It seems that the rule presently provides such an exemption only for airline pilots.
2. The documentation requirements in the rule (especially fingerprinting) are overly burdensome and should not be applied uniformly to all individuals. Submission of passport and visa information could be required in a first step and should be sufficient in most instances. If these raise concerns, TSA could require additional information such as fingerprints in a second stage before issuing clearance.
3. The required security clearance for flight instruction seems to be specific to a particular flight school, rather than to an individual. This makes it difficult for individuals to change flight schools or even their private flight instructor. It would be preferable if TSA could issue a "portable" security clearance that flight training applicants could present to the instructor or flight school of their choice and that could be verified online by the flight school (in the same way that information on pilot medical certificates is public and can be verified online).
4. The rule itself is inefficient in that it places a serious burden on a large target population of which only very few pose any security risks. It is well known that the principal terrorism risk in the foreseeable future emanates from a very specific demographic. Detailed screening of a much larger population is a waste of scarce resources.
5. The security risk emanating from large aircraft is significantly greater than that stemming from small aircraft. Yet throughout the rule, special exemptions are granted to airline pilots. The rule thus proposes stricter standards for the lower-risk sector (small aircraft) and laxer standards for the higher-risk sector (large aircraft). This seems arbitrary and contrary to the stated objective of the rule.