Responses

to the

Sport Pilot Forum

Responses Received

from

April 1 – 19, 2002

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Question Number 1 – In general, do you agree or disagree with the FAA's proposal?

(1) In general, do you agree or disagree with the FAA's proposal?

Visited: 1435	Total Comments: 330	Last Post: 5/6/02

Comment NO: 2 **User Name: Comperini**

SP has potential for many people/planes, but there also needs to be a upgrade to Part 103.

Comment NO: 14 **User Name: delta2ul**

Overall agree with some small changes

Comment NO: 15 **User Name: clelandr**

No Comment

Comment NO: 26 **User Name: DartHere**

1, DISAGREE COVERS TOO MANY AIRCRAFT It covers too many types of aircraft. Everything from the $ 8,000 PPG to the $ 250,000 German built motor Glider, and from the 35 mph Weight Shift to the 120 mph Fixed Wing. It is too difficult to write a good FAR that won't lack in one area or another when you try to write so broad to cover so many aircrafts. If you read the comments being made to the FAA, it is very clear that there is a big divide between GA and UL on this NPRM: (a) GA want more aircraft included (b) UL want less aircraft included GA likes it because it gives them more freedom to fly at less cost. UL hates it because it takes away present freedoms and costs more to do it. GA likes it because it allows them to avoid the Medical as well as the "51% rule" on an experimental aircraft- without changing other current restrictions. UL only find that they will now be able to give rides legally, while adding increased instruction requirements, altitude restrictions, repair restrictions, make and model restrictions, and additional paperwork.

Comment NO: 37 **User Name: capella1**

We generally agree with the Sport Pilot consept as proposed, though we feel some minor alterations are required to further streamline procedures and the compliance process.

Comment NO: 46 **User Name: RDavis**

I disagree with the concept as proposed. It is unnecessarily complex and restrictive. The same results could be obtained by changes to the recreational pilot certificate to allow drivers license medical, increases to several parameters of Part 103, making the two-seat ultralight training exemption a permanent SFAR and making the issuing organizations heavily responsible for its compliance, and changes to the rules pertaining to experimental aircraft certification to allow the 2-seat aircraft not used specifically for Part 103 training to be registered as experimental. Simply, convert the 2-seaters to experimental under recreational pilot with drivers license medical, and increase the single seat Part 103 weight, speed and fuel allowances to more accurately reflect what is the current state of the art.

Comment NO: 55 **User Name: cbranagh**

Yes I agree.

Comment NO: 77 **User Name: Bradley**

FAR 103 should be modified to include 10 gal fuel capacity, and allow 2 seats and greater weight limitations. You should modify what exists to make it more appropriate.

Comment NO: 92 **User Name: artspain**

In general I agree. This has the potential to positively impact General Aviation.

Comment NO: 119 **User Name: w1bfn**

This is a well thought out and ground-breaking proposal. It is the perfect answer to the "fat ultralight"

Comment NO: 120	User Name: w1bfn

This is a well thought out and ground-breaking proposal. It is the perfect answer to the "fat ultralight"

Comment NO: 136	User Name: daberti

The fundamental issues presented in this proposal are long overdue and should be implemented.

Comment NO: 151	User Name: CVJ

The proposed rule is excellent. The restriction to daylight, VFR flying, at markedly reduced expense will provide a real stimulus to general aviation. I predict that accident rates will fall because we will be able to afford more flying time(& experience) but in safer conditions. The proposed rule will provide much more cash flow to the manufacturers and stimulate more innovation in devices that make flying safer. (Controls and instruments on certified light planes are to hard to reach and use precisely). I would like to see 100 # added to the gross limit for floatplanes and seaplanes. I'm a register engineer and an incomplete quadriplegic, did pass my flight physical and have been taking lessons during the past year.

Comment NO: 153	User Name: barnesrc

This will be an outstanding success in revitalizing the general aviation industry!

Comment NO: 167	User Name: Goflyslow2

I disagree. As per The Regulatory Evaluation, Initial Regulatory Flexibility Determination, Trade Impact, and Unfunded Mandates Assessment, Certification of Airmen and Aircraft for the Operation of Light-Sport Aircraft; ARAC Recommendation (page 8); The ARAC was establish in 1991 to assist the FAA in the rulemaking process. The FAA asked ARAC to review part 103 and to make a recommendation to FAA whether new or revised standards are appropriate. After numerous discussions at the working-group level and after consultation with the FAA, the working group reported to the ARAC and the ARAC INITIALLY recommended to the FAA the following: 1. The current privileges and limitations under part 103 should remain intact and the related exemptions should be continued. 2. "Primary Category certification is not economically feasible" 3. The current Recreational Pilot certification rules in Part 61 are unnecessarily restrictive" The FAA did not and would not accept the previous recomendations and on June 16,1995 the FAA "revised" it's task for the ARAC. With enough "FAA task revisions," FAA steered and bound the ARAC toward the "recommendations" that the FAA wanted. This tactic is and was, not an open discussion with FAA listening to recommendations. FAA formulated and implemented their own proposal under the guise of interactive discussions. You response is requested. Charles Scrivner

Comment NO: 168	User Name: Ultraliteteacher

In general, I disagree if left as is. This could have been accomplished in less than 2 pages. One can do it in 3 FAR alterations to Part 103. Even if Part 103 was not to be used as a foundation, this could have been safely done in less than 2000 words. Rec Pilot gets DL Medical. Allow instruction for hire in any certificated (experimental too) aircraft weighing less than 1232 pounds. Part 103 gets Malone proposal(330#/10gal/80mph) or exemption limits(496#/10gal/75mph/2seats). Done. The NPRM has a lot going against it simply by being 46+pages added to the existing FAR's. There was neither need, nor desire by the majority of the affected public for anything more than what I have proposed herein.

Comment NO: 193	User Name: sthomason

I agree most heartily! This will open the door of aviation to many more people and should pump much needed people and their dollars into an ailing industry. It will also keep general aviation from remaining a "rich" man's activity.

Comment NO: 206	User Name: Batson

I agree with the NPRM as written. It is a fair and reasonable approach to revitalizing the recreational aspects of GA.

Comment NO: 226	User Name: nleggett

Hello, I agree with the FAA proposal for light sport aviation. Nickolaus E. Leggett

Comment NO: 228	User Name: nleggett

This proposal is appealing because it supports rural fun flying. Thank you for putting life back into private flying. I would like to own, fly, and maintain my own sport airplane. Nickolaus Leggett, Private Pilot

Comment NO: 230	User Name: sheintz

Yes. The proposed rule has the potential of revitalizing recreational aviation while improving aviation safety.

Comment NO: 237	User Name: Dennis

In general, I agree, but needs some changes

Comment NO: 247	User Name: E002SA

In general, yes. In specific, no. There are individual aspects of the proposal which have the potential to decimate the current light aircraft community.

Comment NO: 260	User Name: gyrochuck

I agree with the Sport Pilot idea as a whole. But there are certain sections which I feel will not contribute more to safety or aviation as a whole.

Comment NO: 262	User Name: dalemseitzer

I agree with the training requirements--training has always been effective at increasing safety. I don't belive there are enough trainers to do the job if one follows the NPRM.

Comment NO: 268	User Name: whiteman

Yes, I agree with these proposed rules changes. While there are some problems in the detail, I feel that this is a good starting point with a revisit at some point in the future after more experience. It farther seems to me that this set of rule changes has been a long time in coming, and is overdue. I feel that the NPRM should be accepted with the caviat that minor adjustments are needed. To get bogged down in senseless bickering is doing an injustice to the flying community.

Comment NO: 273	User Name: Barac

I agree very much. Although, some particular issues developed by the NPRM need be addressed in the near future.

Comment NO: 280	User Name: Q

This proposal will kill ultralight aviation by making it too expensive and difficult to find training. Only by leaving the ultralight training exemptions in place or writing them into part 103 will this rule succeed. Why not just make some minor changes to Rec Pilot, write the training exemptions into part 103, and forget sport pilot alltogether?

Comment NO: 282	User Name: mike

No Comment

Comment NO: 284	User Name: suhagen

Disagree

Comment NO: 286	User Name: jf1acai

I think that anyone who is licensed to fly an aircraft should have to have at least the current 40 hours of flight time. I think this is necessary in order to build correct responses to the events that can occur in flight, which require quick, nearly automatic response.

Comment NO: 287	User Name: DoRight

No Comment

Comment NO: 288	User Name: SunKissed

No Comment

Comment NO: 291	User Name: Donald F Comer

No Comment

Comment NO: 292	User Name: deeph2o

I would very much like to be able to afford to complete the flight training I started before my children were born. I can't afford the time or money right now. I know that I am not the only one and that the airplane industry is hurting for money right now. I have taken both of my daughters to young eagle flight opportunities and hope they too can someday get their licenses if they have the commitment and focus required to do so. I do not think putting people in the air with less training than presently required would be acceptable. Just hearing of the proposal makes me wonder if the FAA may be willing to put the public at risk for the sake of the airplane companies who need more cash flow. I learned to SCUBA dive from a retired Navy Seal. It was tougher than most dive courses but those of us in it were much better prepared for the open water than those with less challenging classes. I want to learn to fly in a similar fashion someday.

Comment NO: 293	User Name: EricDL

In general, I agree with the proposal, but have some concerns about medical certification and runway incursion avoidance training in lower hour pilots.

Comment NO: 307	User Name: garyo

Many items will have to be ironed out and a more final explantion will have to be made in the grey areas before one can give a proper affirmative on this proposal.

Comment NO: 308	User Name: woodg2

As a private pilot on a limited budget, this will make aircraft ownership and frequent flying a reality for me. More frequent flying will result in safer pilots since there will not be as long of a gap between proficiency flights. A large number of private pilots average under 50 flight hours per year (usually 2-3 per month). With the sport pilot riule in effect, pilots with a limited budget will fly more often for the same or less money. More frequent flying results in more proficient pilots!

Comment NO: 312	User Name: SunKissed

No Comment

Comment NO: 313	User Name: jmahaffy

Allow individuals more freedom to make choices. However, maintain *reasonable* protection for the rest of the population.

Comment NO: 317	User Name: robk

I am not a pilot yet, but I hope to begin taking lessons in the next year or so. I must admit that I do not know all the particulars of the proposed changes, but in general it seems that reducing the flight hours for sake of financial convenience is fundamentally wrong. Although it would be nice to complete my training with only 20 hours in the air, I think that this is one of those situations where the standards should error on the side of excess rather than convenience. It's frightening to think that standards could be lowered in such a technical endeavor. A pilot friend of mine, who I fly with occasionally, is the most methodical and safety-aware person I know. More pilots should be like him... not less. We need not look any further than the streets and freeways to see what lowering the standards does. There are so many incompetent drivers who really should not be granted a license to operate a car (it should be thought of as a "privilege" not a "right"). They didn't take the time to learn to drive, and tested with standards that only a mentally handicapped person would fail. How can the FAA even think about lowering the bar IN ANY WAY WHATSOEVER for people learning to operate an aircraft? As someone who would benefit from the lowering of flight hours... I say no thank you. I'd rather do my time, learn a bit more, and be a better rookie pilot.

Comment NO: 318	User Name: robk

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Comment NO: 319	User Name: eshetney

No Comment

Comment NO: 320	User Name: Telletdl

In general I agree with the establishment of the sport plane category. The current manufacturers of these plans have good, safe products which are only being kept from market (as pre-built planes) by the cost of certification. I believe these light planes can be flown as safely as certified aircraft withing the guidelines of the proposal. However I don't agree with reducing the hours required to twenty - forty is not realistic for private, 20 is not realistic for sport aviators.

Comment NO: 321	User Name: taildragger

No Comment

Comment NO: 322	User Name: handbook

Have you FAA people lost your collective minds? Why put stupid, incompetant people in airplanes? How many people on the ground will die because of an inexperienced pilot freshly graduated from "Lite Pilot Training"? Lesson from Sept. 11th...let's make it harder for people to fly - not easier.

Comment NO: 323	User Name: frjn

I agree that for the purposes of taking a passenger, Sport Pilot is a reasonable approach, but with some changes. However, I do not agree it is necessary for single-seat vehicles which are in excess of 254 lbs. As it is generally agreed that most of the aircraft which pass as ultralights are indeed over the weight limit, their safety record should speak for itself -- They have had a remarkably good record.

Comment NO: 324	User Name: challengerpilot1

In general I agree with rule.

Comment NO: 326	User Name: Joe G

Proposal has merit for improving sport flying and allowing pilots that have lost medicals to fly again. However, as written will totally destroy ultralight flying, unless Part 103 is upgraded to provide for 21st century technology to be legal under the part.

Comment NO: 335	User Name: splat21

I soloed with about 14 hours and I cannot see anyone having enough experience to safely operate an airplane with only 20 hours. Unless you charge a lot of money to get this license to augment your accident investigation team, there is no way this should happen.

Comment NO: 341	User Name: creilly

I agree will be a great step forward for the FAA

Comment NO: 342	User Name: KAO

100% DISAGREE !!! Someone with ONLY 20 hours student flight time is a hazard to themselves, other pilots and those living on the ground. This is NOT like driving a car ! and should never be thought of for that type of convince. Most people don't check their tire pressure, you think they're going to go through a comprehensive pre-flight check ? Forget it.

Comment NO: 343	User Name: Barac

I wanted to add another comment. I believe that the minimum 20 hours is sufficient for these less complex aircraft. What people have to remember is that this is MINIMUM. If the student needs more time to safely fly, it's up to the instructor to require it and hopefully the student to recognize it. Just like most people don't get their Private Pilot's certificate in the MINIMUM 40 hours, I think we will see that most will tend to go above the MINIMUM 20 hours to get Sport Pilot's certificate. This MINIMUM time would be a benefit primarily to people who take to flying well and pick it up quickly. Also, consider that this is a replacement for an already in place procedure of training that requires only 10-20 hours MINIMUM to be a pilot (Part 103 exemptions), and that has been successfully producing safe pilots. Anyone with a problem with this MINIMUM time, ask them at what time they solod? Where they a danger then? Did they kill themselves and/or anyone on the ground with such short time? Please, leave up to the instructors and students to determine MAXIMUM time required!!

Comment NO: 344	User Name: tpulley

As a fairly recent soloist, and "fun" flyer. I would agree. I have put finishing my private pilots license on hold until the funds are there. I currently hold around 36 hrs and met almost all of my requirements. When my instructor and I would go up, there were many times I wished we didn't have to do ALL of the requirements for the private pilot license (3pt cross country, cross country journeys, night flying, night landings etc). I really just wanted to have fun flying around the rural areas near my home. Safely of course, but isn't that left up to the instructor to judge if the student is ready for the air alone. There were times when soloing across country that contradicted what I really wanted to do, fly over my local area and see it from the sky. Explore the things around me from a different view point. Safety has been a factor in FAA regs to date, I cannot imagine this being a change of direction in regards to safety for all concerned.

Comment NO: 345	User Name: jdalexa

Overall, I agree with the Sport Pilot Proposal as it exists. The current FARs do not address the entire new class of aircraft that have evolved out of Part 103 and the increase in experimental kit planes. These slow, low energy aircraft require different levels of training than their bigger siblings. Also, aircraft under this proposal will put ownership of new planes in reach of average persons, and hopefully revitalizing the light aircraft industry in the U.S.

Comment NO: 346	User Name: thetac

I dont feel that 20 hours of flight time is enough experience to exercise the rights that "sport pilots" will be given. Does this mean that they will be mandated for 10 hours of dual time? Again, not enough, leave it like it is. Flying an aircraft solo is a huge responsibility. There are those who will argue that 20 hours is the minimum and it will be left up to the flight instructor to decide if they are proficient at the prescribed minimums. I don't feel instructors should be given that option, I don't personally know of ANY private pilots that were proficient in exercising the rights of a private pilot with exactly 40 hours. Allowing "sport pilots" to fly with a minimum of 20 hours and then saying you can't fly at night and can only have one passenger, etc. is asking for trouble. Who's going to enforce those rules? And we all know that those individuals will do what they want at uncontrolled airports...putting the rest of us in danger!

Comment NO: 350	User Name: BICEMAN

I strongly disagree with the FAA proposal. All I see is a handfull of people, who could care less about damage to life and property on the ground, trying to change things to meet their own selfish ends. I can't see anyone who has a lot of experience in the air agreeing with this. You people who are inexperienced need to heed the comments of the more experienced pilots who have been there and done that. To turn someone loose in the air without a proper MEDICAL is insane. We don't need people with major medical problems, such as frequent siezures, major heart problems, etc.etc. flying in our skies. We all have our limitations in life, and flying an aircraft when the pilot is in bad health is showing absolutely no regard of life and property on the ground.

Comment NO: 351	User Name: Gene

No Comment

Comment NO: 353	User Name: DAK

No Comment

Comment NO: 354	User Name: DAK

I strongly disagree, there would be many more crashes and deaths.

Comment NO: 355	User Name: pahilton

I believe this is a great proposal to allow more people to get into the air. The current cost is just to high for most people.

Comment NO: 358	User Name: sam

I think that we're doing a lot of current and pending student pilots and instructors a disservice by slamming the 20-hour minimum proposal. I'm certain that practically every student or prospective student pilot would gladly use more than 20 hours to be proficient in the aircraft and practically every instructor would not hesitate to keep a student more than 20 hours to insure his/her proficiency. Overall, this proposal has a lot of merit and it could be a significant boost to GA and the overall economy. I would also ask all those who are concerned about the minimum hours and the self-certifying medicals this question: If you were the student right now or the pilot who lost his/her medical, would you take less training just to get into the air or would you risk your own life by flying with a known health problem? If you answered yes or even maybe, then the problem is not with the proposal, it's with the individual.

Comment NO: 374	User Name: KAO

Currently the state of PA requires drivers to have 60 HOURS of in car driving experience with a licenced driver. Someone thinks an individual will be just as safe in a plane (which is more complicated, on every level) Someone has a screw loose at FAA

Comment NO: 375	User Name: wjwil

Without certain changes I have to disagree.To be fair to all non-commerical GA pilots the sport pilot should have to obtain a III class physical or either let non-commerical pilots certify their medical condition with their drivers license also.

Comment NO: 379	User Name: jim

No Comment

Comment NO: 380	User Name: jim

Yes

Comment NO: 382	User Name: bobkat

Agree with most of it, although a few things need t"tuning up" a bit.

Comment NO: 383	User Name: bobkat

Agree with most of it, although a few things need t"tuning up" a bit.

Comment NO: 388	User Name: jwalters

After carefully analyzing the information I see no appreciable reduction in the cost of one to acheive the parameters of the sport pilot class license, particulary, how many actual dual instruction flight hours are required prior to the issuing of the license.

Comment NO: 399	User Name: seneca2_77

I think the new categories will allow many people to participate in aviation who may not have been able to due to the FAA medical requirements or high costs of owning and opperating GA aircraft.. I believe there should be a higher PIC time requirement to carry passengers though.

Comment NO: 406	User Name: ch900

In general, an excellent proposed rule change that has the potential to involve more in general aviation. I notice in the other comments that many seem confused about the competence issue. 20 hr minimum (note absolute minimum) is fine. The slow air speed, requirement of further endorsement to step up one knotch, the slow landing speeds with commensurately low kinetic energy landings, etc. all seem a responsible step to take. I would be worthwhile to consider an additional hourly minimum to be required before permiting the sign-off for higher cruise speed, radio work, etc. Some commenters seem to be confused between driving competency and flying competency. They are not the same. If you are incompetent you do not fly under this proposal. The drivers licence is about certifying medical fitness and I, for one, applaud it heartily. I am concerned about that there will not be the training corp or aircraft base needed to allow the required training in type. This will defacto winnow down the number of players. It it not clear that the rule will motivate the Fat Ultralight pilot to "join up" but at least it provides a regulatory path to do so. It is important to assure the Part 103 training exemptions remain in place. I am disappointed some minor expansions of the Part 103 umbrella have not occurred.

Comment NO: 420	User Name: Dan Bergstrom

I am 52 yrs old and have been flying for over 35 years. I have owned 5 airplanes and am about to buy #6. I am also an A&P mechanic and hold a repairmans cert. for the Sonerai 1 that I built in 1975. I think the FAA Sport Pilot proposal in general is an excellent idea and is long over due. It finally acknowledges that flying a small, slow, light plane is no more difficult or dangerous than driving an automobile. It will help keep current, aging pilots flying and just maybe it will bring in some new ones. The proposal may need a little fine tuning but in general it is sound and makes good sense. I for one would like to see a little more flying activity (other than talking) at my local airport... which is dang near dead most days.

Comment NO: 430	User Name: hawkul

A legal ultralight trainer has a takeoff weight of about 1000 pounds. A student that completes instruction in that trainer should be able to fly an ultralight with 600 pounds takeoff weight, 10 gallons of fuel and 80 MPH continous cruise speed.

Comment NO: 442	User Name: hawkdrvr

Ultralights should not be put in the same category (part 91) as GA aircraft. Ultralights and ultralight type craft should be left in part 103. Part 103 should be updated to encompass the newer safer ultralight type craft.

Comment NO: 458	User Name: Buford111

The proposal is certainly a gaint step in the right direction. Some will argue that the minimum requirement of 20 hours is too short to produce safe, proficient pilots. For some students this will definitely be the case. That's why we have empowered intructors to make the go/no-go decisions. Flying is a lifetime learning experience.

Comment NO: 461	User Name: Markus2u

I agree with the proposal. Something should be done and this is a great start. Most will have a concern with the minimum 20 hrs but we have to remember this is just a minimum and we should leave it up to the Instructors and Students.

Comment NO: 464	User Name: Steve

I agree with the propasal. General Aviation badly needs this sort of stimulation. I have read many neg comments on the time requirement of 20 hrs. One has to keep in mind that this is a min time req. The instructor and examiner have to make the call on when each individual pilot is ready for certification. One also has to remember the type of aircraft this license applys to. These pilots will not be flying Bonanzas in congested airspace. They will be flying Cubs , Champs and very lite aircraft in rural areas.

Comment NO: 466	User Name: Dave Jackson

Agree.

Comment NO: 468	User Name: vjunod

I think 20 hours of training for pilots is ludicrous! We require at least 50 hours just to get a driver's license to drive an automobile! I certainly would not fly with a pilot with only 20 hours!

Comment NO: 470	User Name: William G. macIntyre

I am now building an RV8, and will also buy a new commercially built sport plane as soon as the NPRM is finally approved. However I present to you my fear that, for a few hundred pounds in weight limit, many Sport Pilots may die due to engine failure. There is no other new small aircraft engine that approaches the high reliability and consequent 2400 hour TBO of the Lycoming O-235. The only other currently manufactured and certified alternative engine in the 100 hp category is the ROTAX 912, which has less than half the TBO of the O-235. This lower TBO is to be expected due to the lighter construction, higher operating RPM, and complexity of the gear drive of the 912. Unfortunately, the trusty O-235 is a heavy little bugger that puts two place aircraft using it slightly over the proposed Sport Pilot NPRM weight limit. I note that Continental O-200 engines are now rare and are generally unavailable for new aircraft. I believe the experimental portion of the sport pilot fleet will quickly take up the few rebuilt O-200's now available. As things now stand in the draft NPRM, I will buy an aircraft such as the Zodiac with a ROTAX engine and hope that my skill in off field landing is adequate if ever needed. I will also be saddened to buy a foreign made engine rather than buying American, as will I not be supporting the US general aviation Industry. My RV8 will have a brand new Lycoming 0-360 engine. As an RV builder, I respect Van's recommendation to use only Lycoming engines. I wish to God that I could have a Lycoming engine in my Sport Pilot plane as well. Incidentally, I could (and certainly would!) buy a new Citabria 7ECA which meets (or could be easily modified to meet) all but the weight requirements of the Sport Pilot except weight and has an O-235....should the NPRM be modified to allow it.

Comment NO: 474	User Name: carl

i agree has been a long time coming

Comment NO: 478	User Name: kepfordj

I Believe these changes are a long time coming. I want nothing more that a chance to fly low and slow in the rural areas. I remember a kid how busy the local airport was, now it almost a ghost town. Maybe I'll go on to a more advanced license later by this will get me in the air now.

Comment NO: 486	User Name: W6KOW

In general, I agree with the FAA's proposal. Some elements need to be refined or altered.

Comment NO: 500	User Name: dmyhra

I Agree with the current Proposed Rule.

Comment NO: 526	User Name: lfries

This NPRM clearly shows that the FAA is promoting Aviation.

Comment NO: 527	User Name: steve.stefanic

Excellent proposal. The training requirement is fine!

Comment NO: 528	User Name: slowflyer

I disagree. The reason is because the FAA is requiring all ultralight instructors to buy a new 'FAA compliant' training aircraft within 3 years after this proposal goes into effect. There are very few instructors that are willing to make that kind of a transition when the price of those aircraft will be upwards of $30, 000 a copy. No instructors, no training except for those daring pilots that are willing to teach themselves. Is this what the FAA wants?

Comment NO: 532	User Name: 12rick

I am in agreement with the spirit of the proposed rule, but believe that the weight limit should be raised so that some of the existing Standard certified aircraft could be used, at least initially, as trainers to get a larger number of Sport Pilot students started on their way to becoming licenced Sport Pilots.

Comment NO: 537	User Name: 584241

No Comment

Comment NO: 563	User Name: stewart

Yes, I think this is a great idea. I like to fly, I fly for fun. Flying should be fun, and reasonably available to all who want to join in. Anything that will make flying less expensive Iam all for it. The drivers license medical is fantastic. This will allow many experienced, licensed pilots to return to what they love the most, and thats being in the air. Modern medical advances have long ago passed the FAA regs. I want to thank the FAA for opening up this opportunity to be able to fly REAL airplanes again.

Comment NO: 571	User Name: Citabria

I agree with the NPRM but would like to see the gross weight increased to encompass more already certified aircraft. If the gross were say 1750 lbs. it would allow many more aircraft that otherwise meet the performance standards to be used. I also believe that doing away with the 3rd Class Medical would be a step forward since a pilot must "self certify" his medical condition every time he flys. A valid drivers license would be a useful alternative for Private Certificate holders and below.

Comment NO: 572	User Name: Robert Coatney

As an pre-engineering student, I give full support to any plan that will help me fly cheaply without compromising safety. At my flying school, rates are jumping to $70/hour...just for the plane rental! This is simply unacceptable. A steel-tubed "cub" configured kitplane equipped with a ballistic chute is safer than a "tin can" 150, and it's considerably more economical. It is about time that we open up this "second era of barnstorming."

Comment NO: 573	User Name: Robert Coatney

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Comment NO: 574	User Name: robertthomas

I agree. The weight limit should be increased to include any certified aircraft which meet the speed requirements.

Comment NO: 575	User Name: barryfoer

In general, I disagree with the rule. The proposal is a step in the right direction for some homebuilt and experimental fixed wing craft. It will also be great at times for folks who have minor medical problems. But, as I see it, this will by and large present a burden to the ultralight community. Under the proposed rules, I do not see how this proposal will be good for business or safety. Manufactures, parts distributors, professional instructors and mechanics all stand to lose both time and money. Participation and entry of new folks in exempt flying will very likely decline. The costs involved are hard to project, but ALL reasonable estimates for these groups of flyers trend towards a major increase in terms of time and money, just to stay in compliance under these regs. I see no benefit, and perhaps new problems with safety concerns under the proposed regs. As inexpensive, exempt flying represents the largest growth segment in aviation, I generally disagree with this propasol.

Comment NO: 576	User Name: Taylorcraft078

A simplified set of rules makes a lot of sense in light of the wide range of aircraft. I own a 1941 Taylorcraft. It will not fly at night, does not have a VOR or transponder, and because of this I avoid towered airports. The cost to fly is much lower than the newer stuff and the skills required are very different. I would suggest upping the gross to include Chiefs and Taylorcrafts that were built as seaplanes. My plane qualifies but if it had been built as a seaplane it would not.

Comment NO: 606	User Name: gerryg

I agree with the proposal...it should help reduce the cost of learning to fly, will update the Recreational Pilots Certificate, and also help to rejuvinate the industry as a whole. I also agree with the change in relaxing the requirement of a 3rd class medical...I believe they should also relax the requirement for both the Recreational and Private Certificate, but not for the Commercial.

Comment NO: 608	User Name: cec1155

No Comment

Comment NO: 618	User Name: greywing

Wholeheartedly agree. However it needs a little "tuning-up" with respect to the aircraft/CFI's qualified for training under the Sport Pilot proposal.

Comment NO: 624	User Name: Dennis Estenson

In general, I agree, but why not medically self-certiy all non-commercial pilots?

Comment NO: 633	User Name: flychallenger

The ARAC was formed many years ago to solve the Ultralight problem, and it ended up being a way for GA pilots who lost their medical to continue to fly. You will find very little participation from the UL community, and the ranks of ultralight instructors will dwindle drastically. A FAR better solution would be to change the current REC certificate to the proposed driver's license medical, and change part 103 to include the "Fat" ultralights. We all know that ultralights have evolved over the years, adding safety items as brakes, reduction drives, dual ignitions, larger engines, extra fuel, sturdier tubing, fairings or enclosed cockpits. These all add weight, to the point where it is almost impossible to find an ultralight under 254 lbs today. With the Rotax 503 (the most popular UL engine today, with dual ignition) using a tad less than 4 gallons/hr, the 5 gallon limit is also too restrictive for safety purposes. I propose that the figures in part 103 be raised to 360 lbs, and 10 gallons of gas. An upper speed can be kept in check by keeping the clean stall speed at around 39 knots. This will bring most, if not all of the "Fat" ultralights into compliance again. If the FAA is worried that the new standards are too much for the beginning UL pilot, it could reserve the new limits to pilots who have completed an already-in-place ultralight pilot testing and registration process administered by USUA, EAA, and ASC. Of course, two-seat ULS would still need to be registered as a trainer or Experimental. Lastly, make the current trainer exemption a permanent part of FAR 103. The process has worked well for many years, and relieves the FAA of the extra manpower and $$$ it would need to implement the programs itself. With these VERY simple changes to existing rules, there is no need for the Sport Pilot proposal.

Comment NO: 635	User Name: jwg

Completely agree. When I learned to fly many people soloed with 6 to 8 hours. So much of the private pilot training is focused on things not immmediately important to the sport pilot (night flying, frequent Class B or C airspace operation, instruments) that without those things 20 hours of training should be plenty. Fine tuning is always is possible, but in this case most of the comments suggesting it seem to concern different issues, such as increasing the weight limit for UL craft. That may well have merit, but lets stick to the point here. The proposal is essentially good as it stands.

Comment NO: 641	User Name: towpilot

I'm in close agreement with the proposed rule with changes to be noted elsewhere. It is obvious that a lot of critical thought has gone into this proposal and the results are a reasonable and workable compromise that will fairly well maintain the freedom and fun of small light aircraft while sensibly regulating the increasing Commanded Kinetic Energy (and thus potential for damage) that fat ultralights bring. Really well done!

Comment NO: 648	User Name: Triplek45

I disagree. There are too many issues that are unclear or nonfinalized. It would be like signing a blank. I don't trust my government to fill in the blanks in my best interest.

Comment NO: 662	User Name: aeromac

I agree with the proposal, but the gross wieght wouldn't allow for some very popular training aircraft. I would like to get a sport pilot license, but where are all the instructors going to get thier aircraft so soon?

Comment NO: 663	User Name: goluscombe

I agree wholeheartedly with this proposal. This is a triumph of collabration between government and the society for which it serves.

Comment NO: 672	User Name: Flyguy958

This new rating will be a great way to train new pilots and renew the aviation industry.

Comment NO: 681	User Name: go4it2oo

No Comment

Comment NO: 684	User Name: radfordc

Generally agree. Current student pilots are allowed to fly alone with far less than 20 hrs of training. The 40 hrs for PPL training includes cross country, flying in controlled airspace, night flying, instruments, etc. Take away all this training since SP is limited to day, VFR, uncontrolled airspace only. Now you are down to about 20 hrs.

Comment NO: 686	User Name: radfordc

Generally agree that the proposal is good for operation of two seat aircraft. However, it is excessive for those who want to operate "fat UL" single seat aircraft. Allow single seat aircraft of 400 lbs empty weight and 80 mph top speed to operate under Part 103. Also, allow SP-CFIs to train in Experimental Light Sport Aircraft. If you restrict training to only Special LSA, the cost of these planes will force many current Part 103 instructors out. Without instructors, SP will fail. The FAA currently allows instruction to be conducted in experimental aircraft (for transition training), just expand it to initial SP training too.

Comment NO: 699	User Name: slowflyer

I disagree. The safety record for ultralight flight stands for itself. If the FAA wants to regulate them, then write up a proposal for FAT ULTRALIGHTS ONLY. The pilots flying them could be given a written exam, flight check, and let the airworthiness of the aircraft be up to the PILOT flying it. History has proven there is very little risk to the public with these machines. The training program is already in place with available instructors. This is more than I can say for what is proposed under Sport Pilot. Sounds like a weight increase for Part 103 with some testing and flight checks. Why complicate things? If the FAA wants to keep the GA pilots happy then increase the weight limits for them under the SP proposal. Combining the light and slow with the heavy and fast is not a good idea, especially when some of them have a top speed of 25 mph. We need a proposal for FAT ULTRALIGHTS up to 500 lbs empty, single seat only!!!

Comment NO: 705	User Name: Goflyslow2

The FAA has proposed a reduction in flight training and medical standards for new and existing general aviation pilots. In a new category, called Sport Pilot, the FAA proposes to eliminate the now required medical and psychiatric examinations for continued licensure to fly small aircraft. Pressed by aging but affluent groups like the Aircraft Owners and Pilots Association, (AOPA), and the Experimental Aircraft Association, (EAA), the FAA /DOT put forth a Notice of Proposed Rulemaking (NPRM). It should be noted that many, if not all administrative FAA officials are current members of both groups. In this NPRM is outlined a new lower category of Pilot, Aircraft and Training requirements. Pilots that no longer are able to obtain medical clearance will now be able to fly half ton aircraft at 130mph over urban areas and into busy metro airports. All that will be required is that they have a State Driver License. The new proposal also lowers the flight training standards for new pilots in total flight time instruction, Dual and Solo, by 55%. Currently a private pilot is required a minimum of 40 hours instruction. The new proposal states 18 hours of instruction to be required. The FAA position is that by decreasing costs and time for instruction, and to reduce the certification standards for applicable aircraft, and allow the owner of such aircraft to perform work upon that aircraft, the general public to save expenses and will be more inclined to take up aviation. This, in an apparent attempt to stimulate the sagging economic atmosphere that General Aviation finds itself. This proposal is being pushed thru the bureaucratic channels with little fanfare, and there is no doubt as to the reasons why. A Public Comment Procedure, required by law, is in effect now and for the next 90 days (May 6, 2002). It is little known or advertised to the non-aviation minded general public. Interestingly, there are already three avenues that the pilot without medical clearance can still pursue within the sport of flying. One, is Glider flying, motorized and pure glider. These are typically not flown over populated areas. Two, is Ultralight flying, motorized, and glider. Again, these are restricted from flight over populated areas and controlled airspace's. Three is Lighter than air (balloon) These types of flying require lesser amounts of training due to their restrictive areas of operations and restrictive operations within busy controlled airspace's and airports. Both, Glider flight and Ultralight flight and training have shown to be statistically safer in all areas of operations per the FAA incident data System web site and Aviation Accident Data base Querry, ie, out of 78,000 aviation

incidents / accidents, 50 were ultralight related over the last 7 years. Also, a Canadian data base shows fewer accidents and a lower morbidity/mortality rates per hours flown in "ultralight type" aircraft than in "general aviation type aircraft" FAA, in a separate report, notes 81 U.S. fatalities in "ultralight type" aircraft over a period from 1996 to 2001. It is noted that many of these fatalities were FAA Certificated Private Pilots, flying unregistered light experimental AIRCRAFT. In contrast, over the same period, the NTSB shows 11,122 General Aviation accidents with 3,610 fatalities Another statement that FAA makes, is that there are numerous unlicensed pilots, flying unregistered aircraft thruout the country. And that this condition has shown or has potential to create increased numbers of accidents. Again, the data bases do not reflect this assertion. But If, in fact, there are numerous unlicensed pilots with unregistered aircraft, it would appear that FAA is attempting to resolve the issue by regulation as opposed to oversight and enforcement. Checks for credentials at airports would seem to be the most logical procedure. That is where the pilots and aircraft are or will have to be at some point. FAA is mandated with that responsibility and have the ability to issue very costly fines. They have apparently fallen down on this duty, if they are to be believed that there are numerous abuses. Twelve years ago, 1989, in another economic downturn cycle, the FAA implemented a similar pilot program called "Recreational Pilot" It's hallmark was for decreased flight instruction time. (less expensive) It was touted as "the new beginning for recreational flight for the public" It was restrictive in areas of operations. It required a 3rd class medical certificate. It is still in effect. The total number of current licensed "Recreational Pilots" under that program is 336 by FAA Data Base. That equates to 28 pilots per year at a cost of millions of dollars to implement. Eighteen years ago FAA implemented Ultralight Regulations. To date there are over 18,000 registered Ultralight pilots to which, a significant number advance to Private pilot status as a natural progression. The new Sport Pilot Proposal is a public danger. It is ill though out. It is self-serving to the above special interest groups. It is deleterious to the current, fastest growing and safest segment in General aviation. Charles L. Scrivner - Private Pilot - EAA member - Aircraft owner - Airport co-owner (L00) e-mail goflyslow2@aol.com

Comment NO: 718	**User Name: zodiacxl2b**

I agree with the proposal. As a private pilot I look forward to the less expensive form of flying, yet I can still rent a 172 when I need it.

Comment NO: 719	**User Name: Wayne McIntosh**

I agree that a new Sport Pilot license/aircraft are needed however the gross weight limit should be 100 pounds more, the phasing out of ultralight trainers will be a disaster to ultralight safety, and the make and model endorsement will prove to be unworkable.

Comment NO: 724	**User Name: FlyDiver**

I can only support SP if 21.191(i)(1) is changed to allow current active BFIs (who upgrade to CFI)to bring their existing 2 seat trainers up to SLSA certification. No way can I afford to buy a new SLSA at the end of the 36 month phase in so that I can continue to loose money instructing. I suspect the majority of existing BFIs (who are part timers like me) will have a similar problem. I do NOT see the majority of existing CFIs moving down in class to SPI. The vast majority of SP instructors will come from existing BFIs or not at all. I am also hearing from USA UL manufacturers that the expected cost for a 2 seat SLSA will more than double with as much as 40% of the cost being liability insurance. This NPRM clearly shifts nearly all of the liability to the manufacturers. Sure would be nice if FAA could figure out how to limit the voraciousness of the trial lawyers.

Comment NO: 738	**User Name: risely1**

I agree. As a commercial pilot I find the current regs a bit discouraging and nonsensical. I would love to purchase a 2 place U/L to enjoy the low and slow flying and also reap the benefits of my Commercial certificate by giving instruction or rides. Unfortunately under current regs for U/Ls I'd be taking a step back; only being able to use the aircraft for strictly recreation or strictly instruction. Modern U/Ls have evolved to be as safe as and even outperform available 2-place airplanes at a fraction of the cost. They're a great way to rejuvenate GA. Nice Work

Comment NO: 746	User Name: bobgilpatrick

I wholeheartedly agree with the rule as proposed. The level of flying that I do will be enhanced by the proposed rules because I won't have to go through the agony of waiting for my "special issuance" medical certificate every year. The proposed rules should greatly ease the medical certification process for the FAA's CAMI so they better serve those pilots that really need medical monitoring.

Comment NO: 748	User Name: j-b-tarkington

Yes, I do agree with this proposal. I have been a commercial pilot & A CFI since 1978. This will allow amny other people to enjoy aviation at a reduced costs.

Comment NO: 750	User Name: jrhorsley

this proposal is great for myself,it is the only way i will ever be able to get a license and fly

Comment NO: 754	User Name: mccoy3

This proposal as stated will bring back interest in flying, just for the fun of flying. This has been missing for some time as can be seen by the decrease of active pilots. Some modifications would improve the proposal, particularly grouping makes and models for pilot endorsements. Five hours PIC time for CFI's within category is too much. Ten take-offs and landings as sole manipulator of controls would be a far more cost effective and reasonable requirement.

Comment NO: 763	User Name: smartin

This rule will allow alot of individuals to remain in, or enter the sport of flying. I for one, am very excited with this opportunity.

Comment NO: 764	User Name: Steve

I strongly agree with the proposal. It will enhance saftey by bringing those who are already out there flying, in to a way of being legal. Example The Heavy UL's. I have read some neg comments on the training time. One must keep in mind that the 20 hrs is a min time required. Just as 40 is a min for the private lic. Not many people finish in 40 hrs. That is a min. Probably not many will finish in 20 hrs for the spl. Taking into consideration the type of ac addressed and the conditions for operation. There is less training that has to be covered, Cross/ country, Nite time, tower operation. We all had only twenty hrs at some point. Flying has always been a constant learning process. Last and not least all applicants still must pass a written and flight test.

Comment NO: 766	User Name: Rich Wallin

No Comment

Comment NO: 767	User Name: Rich Wallin

Yes, I agree.

Comment NO: 768	User Name: jaybray56

I agree with everything except the 115 knt speed limit for the Light Sport plane. I just does not make sense. The Vso and gross weight limit will define safety.

Comment NO: 781	User Name: adagio

For a "shot in the arm" encouraging general aviation, this proposed new rule should really help. I,also, believe that the weight restriction for aircraft should be increased to include the two seat certificated training aircraft by Beech, Cessna, Piper, etc. This would help in the early stages by allowing safe, proven designs into the mix with new aircraft coming from, primarily, manufacturers of homebuilt kits. The balance of old and new should improve safety from both a "familiarity" and "time tested design" standpoint. Many people may be attracted to the, perceived, safety advantage of learning to fly in a traditional trainer built with long established construction techniques and materials.

Comment NO: 787	User Name: airgus

I'm in support of the FAA's proposal. While it still needs a few adjustments in my opinion I think it is a step in the right direction.

Comment NO: 805	User Name: mitchellschoch

I have just started UL training and I am concerned that after the 36 month period that many of the UL instructors will quit training do to the high cost of the certified aircraft that will be required. It is challenging as it is to find UL instructors in my area. PLEASE DON'T TAKE AWAY THE ABILITY FOR UL INSTRUCTORS TO OWN RESONABLY PRICED AIRCRAFT.

Comment NO: 812	User Name: tebrahim

No Comment

Comment NO: 816	User Name: rotter

YES I AGREE. I BELIEVE FAA IS BEING RESPONSIVE TO THE NEEDS OF GENERAL AVIATION. MANY OF THOSE WHO WANT TO FLY ARE NOT ABLE TO BECAUSE OF THE HIGH COST OF A PRIVATE TICKET AND THE EXPENSES ENCURRED WHILE USING IT. IF MY COMMENTS COULD TWEEK THINGS A LITTLE, I WOULD LIKE TO SEE THE WAIT LIMIT UP AROUND 1,800 LBS.THERE ARE SOME VERY GOOD AND VERY SLOW TWO PLACE SPORT PLANES IN THAT RANGE. THE CITABRIA LINE- TRAINING AIRCRAFT- AND THE GREATEST SPORT PLANE OF ALL TIME THE SUPER CUB. HUMANKIND WAITED THOUSANDS OF YEARS TO BE ABLE TO FLY. IT IS VERY REFRESHING TO SEE FAA TRYING TO MAKE FLYING ACCESSIBLE AND AFFORDABLE TO AS MANY AS WANT TO. THANK YOU!

Comment NO: 817	User Name: jkenney

This is needed to foster renewed interest in general aviation and flying as sport. If this does not go through then general aviation and the small GA airports are doomed.

Comment NO: 820	User Name: jmartin7

No Comment

Comment NO: 824	User Name: divie

No Comment

Comment NO: 825	User Name: gkrug

It's vital to aviation, as a whole. I wish to compliment and thank the FAA and it staff, for moving forward with this proposal. Thank You!

Comment NO: 838	User Name: dphillip55

I agree with the proposal. The point is to make aviation affordable to more citizens and I believe this proposal does so.

Comment NO: 842	User Name: SoccerPilot

In general, I disagree. This proposal, as written, will set ultralighting back 20 years. To do away with the training exemption for the two-seat ultralight is UNSAFE! To limit altitude to 2000agl is UNSAFE! To not grandfather UL pilots who have completed their FAA approved courses (ie.USUA)is unfair. This proposal will increase costs for UL instructors so dramatically that it will force many of them out of business. One of the reasons we fly UL is because GA has become so exspensive.

Comment NO: 844	User Name: mgibson

The sport pilot designation will be a great boon to pilots in general. The extremely low weight restriction will be an outright gift to manufacturers of small aircraft. The classification would be more fair and useful to pilots if the weight limit were to be increased to 1800 pounds to included most existing two place production aircraft.

Comment NO: 845	User Name: merryhugh@msn.com

I have read the entire proposal and I feel that this is a major positive step toward restoring aviation and aviation related businesses in the US. I know quite a number of people who have stopped flying in disgust, especially those who have to consider their flying a recreational activity and can not justify the cost. Many of these people will probably purchase airplanes, rent or buy hangars, pay for fuel and services, and in other ways contribute to the national economy. I consider the elimination of the medical exam to be one of the strongest and wisest features of the proposal because. I have heard too many pilots complain about the cost of the FAA medical exam and use that as an excuse to delay, and then ignore license renewal. I have no argument with the weight and speed restrictions. There are a lot of existing airplanes and even more new designs which fall within the restrictions.

Comment NO: 846	User Name: johnckircher

I think that this proposal should not apply to weight-shift-control aircraft or their pilots. I think that the proposal would have the effect of reducing the opportunity to fly for those with disabilities who can currently do so or may plan to do so, by significantly driving up costs.

Comment NO: 854	User Name: lloydhan

Very much

Comment NO: 869	User Name: windele

I agree with the intent of the Proposal. I believe that when a signifiacnt number of comments are recieved that the FAA should gather experts from the EAA and USUA to better define and explain the relevant key issues that the FAA may not fully understand. This will insure that the Key issues are addressed and understood so that key changes may be made and the final rule be the best it can be.

Comment NO: 878	User Name: olereo

Agree

Comment NO: 883	User Name: ultraj51

I think this is the best thing the FAA has done in past 50 years

Comment NO: 890	User Name: Spdrflyr

Absolutely! Congratulations to the FAA for having the courage to create a rule which will undoubtedly assist those GA pilots who have lost their medicals to get back into aviation. Unfortunately, the rule will take us back to the pre-103 exemption days of Ultralight flying...a lot of public property and public lives are going to be lost as a result of the rule if it is not ammended. The loss of the Part 103 training exemption will be devastating. Ultralight flying is the fastest growing element in aviation today...the media is going to have a field day with this one...the "Imfamous 60 minutes UL program" updated for the new millenium! You guys are 'gonna get it!

Comment NO: 898	User Name: tbrandt

1. Yes, in general I agree with the FAA proposal. In support I see an emphasis on training and preparation of pilots and that will contribute to safety and reduce risks for pilots, passengers and aircraft. I do have some concerns and questions specifically related to gyroplanes and gliders. I will address those in answers below.

Comment NO: 911	User Name: jamesobauer

I agree heartily. Unfortunately not everyone can be pleased. But it's a good overall compromise.

Comment NO: 912	User Name: Gator

I am greatly pleased! The FAA has taken a giant leap in the right direction with this proposal. I am a pilot and have been for some time but it became expensive. This is a light at the end of the tunnel!

Comment NO: 918	User Name: Sam Kennedy

great idea. It will regenerate general aviatioin

Comment NO: 922	User Name: Skeeter

No Comment

Comment NO: 923	User Name: Skeeter

I agree.

Comment NO: 925	User Name: Darwin

Less training required (20 hrs Vs 40 hrs for PP) is NOT a good idea.

Comment NO: 926	User Name: berry

I think the sport pilot proposal is wonderful. I am a 16 year old female student pilot. My brother and father also fly. Owning an airplane has been a dream of my family's for years. This proposal would allow this dream to happen. If the proposal is passed my family plans on buying a light sport airplane as soon as possible. I look forward to fun and affordable flying with the sport pilot proposal!

Comment NO: 928	User Name: lavasseur

I believe your proposal, as it is written, will reduce the level of public safety already in place. The new proposal will allow poorly trained pilots in congested airspace flying slow planes when they have self-certified themselves medically. Thank you for considering my opinion.

Comment NO: 931	User Name: gkrol

More training and control of "heavy ultralights" will improve safety. A less restrictive form of General Aviation will make it much more available to many.

Comment NO: 935	User Name: Flyguy

I do agree in general but would like to drop the maximum speed and fixed propeller requirements.

Comment NO: 937	User Name: Terry Davis

I believe this rule is long overdue and if administered with any common sense at all should promote general aviation.

Comment NO: 955	User Name: dfreeman

In general I agree, however I believe that some of the proposal is to restrictive and trying to cover too many "potential problems" initially. I would prefer to see more general regulations and then have amendments that more strict rules as necessary where valid safety measures will result in real measured safety gains. In other words, don't regulate us to the point that we can't get of the ground with this great idea.

Comment NO: 974	User Name: pober

No Comment

Comment NO: 975	User Name: thorerik

This will allow me to realize my dream of building and flying my own plane at a reasonable cost. Trouble is I a big guy. In order to take anyone with me and some useful cargo and fuel I'd like to see the weight restrictions moved up to 1800 pounds.

Comment NO: 976	User Name: pober

Yes, I agree.

Comment NO: 980	User Name: Ro

No Comment

Comment NO: 981	User Name: kcmalls

I agree with the proposal. It will open up light sport aviation to thousands of people. I think the max gross weight should be raised to 1400 pounds with appropriate changes in stall speeds. Flight instructors should be able to use current ultralight two seaters for more than 3 years.

Comment NO: 998	User Name: George

In general I agree wholehartedly in the intent and implementation of the proposed rulemaking. I would like to see the lower stall speeds maintained as proposed but think a little incresase in both max gross and airspeed would be advantageous (maybe to 1500 lbs and 150 mph) to include some older trainers.But,if needs be, proceed as written.

Comment NO: 1005	User Name: bampbs

No Comment

Comment NO: 1013	User Name: Forrest Barber

This is good and has been a long time coming into existence. Well written and needs changed in only a few areas.

Comment NO: 1015	User Name: Harold E. Thomas

I think this is agood idea to stimulate aviation in general and get more people interested in continuing flying when it becomes too expensive.

Comment NO: 1021	User Name: fatplane

The FAA has been "more than pleased" with the way the ultralight community has been able to police itself from a safety standpoint. Why, then, are we going ahead with certificating fat ultralights? With over 250 different models, how can the FAA ever expect to regulate and enforce these regulations anyway? We really don't need this.

Comment NO: 1022	User Name: Safety1st

Safety of future pilots and passengers is compromised by shuffling of categories and purposes for same. Especially true of future ultralight pilots.

Comment NO: 1024	User Name: dwesley

I do have a safety concern about the 2000' alt. limits. any pilot knows that alt. is equal to safety. Please reconsider this part of the rules and give more room for error.

Comment NO: 1025	User Name: Robert

I LOVE IT ... Fixed Propellor seems a little restrictive, Adjustable Ones Have Been Developed for Ultralights and add to Safety. Instructors and Repair Personell Required to be Certified In Each "BRAND" seems to be Beyond Necessary Skills Needed and Requiring Steep Financial Commitments."TYPE" will do

Comment NO: 1031	User Name: RFI

I agree with the general outline of the NPRM but I think that requiring a Special Light Aircraft be required for training by current AFIs and BFIs who already have an aircraft would pose a financial hardship. In the case of gyroplanes it appears at this point that the intent of the FAA is to exclude gyroplanes from Special Light Aircraft certification altogether which would eliminate training completely within three years since the 5209 exemption will also expire in that time frame.

Comment NO: 1050	User Name: terryo

The intent is VERY GOOD, it will IMHO provide a new avenue into the flying arena for younger, (poorer financially) people

Comment NO: 1064	User Name: chuter

Yes, I agree in general. I would like to see the altitude limit raised to 3000 AGL, and better handling of the future training for gyro pilots.

Comment NO: 1068	User Name: thumper

The present FARs makes it too tough to promote General Aviation. Too many FARs, which are too difficult for the average person to understand.

Comment NO: 1071	User Name: george croley

needs to add gyro training !

Comment NO: 1072	User Name: gyrobee

Agreement is contingent on providing some way to maintain an adequate instructor/trainer base to support both Part 103 and gyroplane flight training.

Comment NO: 1074	User Name: Gyroman

I fully agree with the proposal. I am also amazed at the paranoid comment bt others --to think that this proposal will unleash untrained medical misfits into general aviatiopn is absurd!!

Comment NO: 1078	User Name: Flymo

Agree subject to greater cognisance being taken of the need for orderly transition for the gyro community, with a special emphasis on training provision being maintained. The effect of new regulations causing a reversion to the unlicensed operations of the early microlight years would be hazardous to the public.

Comment NO: 1087	User Name: bruce2

No Comment

Comment NO: 1091	User Name: bruce2

agree training in type to a level of compentance, weight should be under 2000lbs, alt 2500 ft agl

Comment NO: 1093	User Name: fatplane

I disagree. The fat ultralight community has had an exceptional safety record (in fact, better than GA aircraft),without the FAA's help. Why, then, should the rule be implemented? The reason the fat ultralights have had so few serious accidents is because of the low (relatively) weight and airspeed, resulting in much less kinetic energy.

Comment NO: 1094	User Name: Walker

In general I agree with the proposed rule. However, I believe the exclusion of gyrocopters to be wrong. The exclusion will lead to less training - not more. By including gyrocopters the rule will help improve access to training and thus improve safety.

Comment NO: 1114	User Name: Topspin

I agree only if gyroplanes are included and/or provision to continue training under the present exemptions is guaranteed. The gyroplane and ultralight communities can not afford to lose the means to train that we enjoy now. I do not understand the rational of the FAA Rotorcraft Directorate for excluding the gyroplane. Including gyroplanes has the potential to standardize gyroplane training, provide a standard for safer trainers and other gyroplane designs. And help grow the number of gyroplane instructors. The lack of instructors is the largest, if not only, impediment to growth in this category.

Comment NO: 1119	User Name: J Brady

agree as long as training and safety are not compromised

Comment NO: 1123	User Name: Darrell and Belinda

I agree that Gryoplanes be included, as student pilots the lack of instructors is alarming.

Comment NO: 1124	User Name: keercnref

I agree with most of the proposal, but the training exemption for gyroplanes needs to be kept as is.

Comment NO: 1126	User Name: Darrell and Belinda

As student pilots the lack of instructors is alarming in the Gyroplane community. Further the lack of Examiners (only one active in the USA) almost negates closing the circle to get pilots certificate. The Gyroplane AFI and BFI should be made sport pilot instructors for sure, while the Gyroplane CFI should be instructors along with being appointed examiners. This would allow the circle to be closed. This common sense approach would improve safety and training.

Comment NO: 1128	User Name: 21214

No Comment

Comment NO: 1131	User Name: kingss

We need anything that can make training more available and affordable to the gyro community.

Comment NO: 1134	User Name: rotopup

Generally, I agree. Concern stems from the possibility of removing some of the current exemptions for training.

Comment NO: 1167	User Name: jonvee

I agree with most of the new rules. I am concerned that training options for Gyroplanes may go away with the NPRM.

Comment NO: 1171	User Name: Bob L

I believe gyroplanes should be included in the NPRM. I would like to see letters of deviation so current gyros could continue being used for training.

Comment NO: 1173	User Name: heronium

No Comment

Comment NO: 1174	User Name: heronium

No Comment

Comment NO: 1184	User Name: Russ King

It is good to see an effort to legalize flying for those who want to fly experimental type aircraft and yet are not qualified builders. However, it needs to address the need for gyroplanes and gyroplane training.

Comment NO: 1210	User Name: PWPlack

Overall, this should be good for General Aviation.

Comment NO: 1215	User Name: helitim

Mostly agree with the proposal. I am very concerned about the changes for the Ultralight instructors.

Comment NO: 1221	User Name: SPAANS

NO NEW RULES Why waste money? Why not finetune the REGS. that we already have and use!

Comment NO: 1238	User Name:pokey1652

In general, I agree. However, I think sport pilots should be able to fly sport aircraft up to 18,000 ft, when properly equipped, not just 10,000 ft, to be consistent with the limits of VFR and not be unneccesarily restrictive on aircraft that are capable of soaring or high altitude flight. I also think, that one instructor should be able to provide both the instruction and sign off for a make and model check out. The two instructor scheme proposed would create an uneccesary burden on those seeking a check out. It is hard enough to find one instructor that is available, qualified, and has access to the appropriate aircraft on a day when the weather is good, let alone two different ones with access to the same make and model aircraft. The two instructor scheme would also be inconsistent with the current requirements for certificated aircraft. Currently, a single instructor can provide complex, high altitude, or tailwheel training, and the sign off. All instructors should possess the integrity and judgement to only provide a sign off when it is deserved.

Comment NO: 1245	User Name: pokey1652

I agree with the proposal in general. In addition to my comment already listed, I think that appropriately equipped light sport aircraft, when flown by sport pilots who have received instruction and an endorsement, should be allowed to tow another aircraft. Specifically, this applies to Trikes and 3 axis ultralights towing hang gliders. The larger two place ultralights are required for this operation, and two place machines are the only way a pilot can learn to tow. This operation is conducted safely all over the US as much of the middle of the country is flat, and towing is the only way hang glider pilots can get altitude to begin soaring on thermals. To prevent this activity by sport pilots/aircraft will be a major set back for many hang glider clubs. These organizations will continue to operate their overweight trikes for towing under part 103 until the exemption expires, and be left without options after that, or operate illegally. Include this activity legitimately in the proposal and it will help get the USHGA on board with the new rule.

Comment NO: 1253	User Name: Dugaru

No Comment

Comment NO: 1261	User Name: skiptyler

No Comment

Comment NO: 1268	User Name: James48843

PASS-MIDO agrees that the proposed regulation adds a level of safety, and provides a path to bring illegal operators into compliance with regulations. We must be careful to ensure proper staffing of MIDO inspectors to reflect the addition workload which this rule entails, particularly supervision of DAR's, and surveillance of manufacturers.

Comment NO: 1273	User Name: Goflyslow2

PASS-MIDO, A bargining unit, (Union) sees an opportunity for increased monetary gains and employment via Sport Pilot. The PASS-MIDO post is yet another example of the increased costs to be incurred from this proposal

Comment NO: 1275	User Name: t2rogered

I agree, if gyrocraft are included and the regulations allow continued training on current (existing) 2 place machines.

Comment NO: 1280	User Name: fatplane

I completely disagree with the exclusion of in-flight variable pitch control propellors for fat ultralights. What is the purpose of this? IVOPROP makes two in-flight pitch control mechanisms expressly for fat ultralights that are extremely simple in both design and operation. Also relatively inexpensive. It looks like the folks at FAA are a little lacking in knowledge on this one.

Comment NO: 1281	User Name: ressma

The proposal will move General Aviation closer to the General Public. I think it is a valuable addition to current regs.

Comment NO: 1283	User Name: craigj00

I agree, however, don't limit gyroplanes. As a recent builder and student in rotorcraft, now is not the time to limit training in these aircraft. Don't miss the boat and exclude gyroplanes. We need more training and instructors, not less.

Comment NO: 1284	User Name: jtriddle

With the exception of the Vh limitation I believe the NPRM is excellent.

Comment NO: 1286	User Name: dalswift

No Comment

Comment NO: 1290	User Name: bwmatz

In general I agree, however I don't think that the gross wt. of the airplane should be the determining factor as to whether it is eligible or not. The Aeronca Champ is eligible, the Chief is not. These aircraft have very similar flying characteristics and should both be eligible.

Comment NO: 1292	User Name: johny

I'ts lookin prety good the ways it looks Johny

Comment NO: 1294	User Name: John Ross

In general I agree, however I think that the gross wt. of the airplane is now too restrictive and should not be the determining factor as to whether it is eligible. Same with the stall speed. The Aeronca Champ is eligible, my Citabria is not. These aircraft are both basic airplanes and should both be eligible. Same with the Cessna 150/152, etc.

Comment NO: 1303	User Name: RocketJoe79

This is a landmark set of rules for those, like my Dad, who can't get a Flight Certificate due to medical restrictions. We plan to buy or build an aircraft meeting the regs as soon as it's approved. Thanks for pushing this through quickly!

Comment NO: 1312	User Name: lsippell

I Do think the weight limit should be higher.

Comment NO: 1313	User Name: lrbutler

The exclusion of gyroplanes from the regulations should be reconsidered. I have found it very difficult to obtain training as an add on to my ASEL certificate. The elimination of gyroplanes will make this even more difficult.

Comment NO: 1319	User Name: rhw5548

No Comment

Comment NO: 1322	User Name: MikeCleaver

In general I agree - in Australia we have had a similar set of rules for about 17 years to date and I see the current proposal as the FAA playing catch-up with Australia, New Zealand, Canada and the UK. However I cannot see why you could not stick with the 1200 lb/544 kg that we now use based on your earlier exemptions. This works well outside the US and should work within it too. However, you are doing several people a disservice by not including gyroplanes (I agree helicopters are too complex for these kind of standards) and by imposing a low height limit. Mike Cleaver, Sport Aviation Inspector Civil Aviation Safety Authority, Australia P.S. I am compiling our parallel rules for operations of all sport aircraft in Australia - in some cases we have gone a bit too far with certification standards but have proved that it can be done.

Comment NO: 1327	User Name: RTHOMPSON

Generaly, I agree. I think the weight limits should be higher, especily for tricyle geared planes. Also there should be a provision for exceptions for specific planes and a way to "placard" a lower gross wieght on existing planes to meet the rules.

Comment NO: 1341	User Name: BoChips

I agee heartily with the FAA proposal. This will open up a whole new opportunity for some of us "old fogies" (I'm 61) who would love to fly but can't afford the traditional route of training and related costs.

Comment NO: 1344	User Name: jgjones

This proposal has the potential to revitalize general aviation.

Comment NO: 1345	User Name: GeraldEmery

I think that the weight limits sould reflect all two place airplanes.

Comment NO: 1355	User Name: Ulflyerus!

Would be much easier to amend 103 to allow heavier planes, say 400-600 lbs, than to make such a complicated beauracratic piece of work that will probably only help existing GA pilots that are losing their medical.

Comment NO: 1356	User Name: knight starr

enthusiasticly agree

Comment NO: 1369	User Name: bfied

No Comment

Comment NO: 1370	User Name: dhansen

No Comment

Comment NO: 1371	User Name: dhansen

Weight limits should be higher which would in turn make the aircraft more crashworthy thus safer

Comment NO: 1377	User Name: ejgeiger

I enthusiasticly agree. I have had a strong desire to fly recreationally and obtain a pilot's license, but the excessive cost has always been a prohibitive factor. I strongly believe that the ability to fly should not be privilege solely reserved for those of greater than middle-class means. If this proposed rulemaking goes into effect, not only will I be able to afford to obtain certification to fly, but hopefully the general aviation industry will be revolutionized as well. I look at the benifits of this proposal as getting more Americans with a strong desire to fly into affordable "real" airplanes rather than just an attempt to legalize so called "fat" ultralights, as others have charged. I look forward to the enactment of these rules, so that I and others of modest means may finally take to the air and experience the joy of flight.

Comment NO: 1378	User Name: slyflite

No Comment

Comment NO: 1379	User Name: slyflite

No Comment

Comment NO: 1380	User Name: wolfsdens

I fully Agree

Comment NO: 1381	User Name: wolfsdens

No Comment

Comment NO: 1386	User Name: JAMES LEIN

No Comment

Comment NO: 1397	User Name: potentialpilot

I absolutely agree that this NPRM is a great idea! I think it should be even more open to more designs though. Gen Av is dying slowly, and this may be the last chance to save it before it's too late. This is largely due to costs, but there's also a lot of blame to be laid on the FARs and FAA for creating what many perceive as an antagonistic environment for "the little guys". This starts with the myriad of bureaucracy to wade through just to get licensed, and extends up to the antagonism exemplified by the Bob Hoover debacle. I believe that cooler heads may finally be prevailing, and that this proposal will go far to remedy some of that. I expect costs to remain a bit high, although in the long term that reducing costs will hinge largely upon the ability to maintain only the amount of regulation truly necessary for safety. I commend the FAA for their support of Sport Pilot and encourage all FAA employees to continue to work to establish friendly, productive, non-adversarial relations with pilots and aviation folks everywhere.

Comment NO: 1405	User Name: humair14

I wholeheartedly agree. THis newpilot category will rejuvinate the flight training industry and be a boon to general aviation overall.

Comment NO: 1421	User Name: biz451

Generally, I disagree with how the proposal addresses (and eliminates) Part 103s training exemption for powered parawings (PPCs, PPWs). Rather than requiring pilots who want fly a two place PPC and carry passengers (*not* for training or hire) to enter a new level of bureaucracy, it would be better, easier, and simpler to amend Part 103 to allow pilots with training exemptions (or an updated equivalent) under Part 103 to carry recreational passengers, fly two-seat planes up to 600 lbs unladen weight, and carry unlimited fuel. For my part, I do not want to fly over congested areas, or bear the regulatory or financial burden of licenses and planes certified to do so. I simply want to fly a safe, two-place PPC with a recreational passenger over unpopulated areas. PPCs are inherently speed limited, so increasing fuel and weight limits of the present FAR 103 would increase pilot and passenger safety without any danger increase to the general populace.

Comment NO: 1422	User Name: biz451

Generally, I disagree with how the proposal addresses (and eliminates) Part 103s training exemption for powered parawings (PPCs, PPWs). Rather than requiring pilots who want fly a two place PPC and carry passengers (*not* for training or hire) to enter a new level of bureaucracy, it would be better, easier, and simpler to amend Part 103 to allow pilots with training exemptions (or an updated equivalent) under Part 103 to carry recreational passengers, fly two-seat planes up to 600 lbs unladen weight, and carry unlimited fuel. For my part, I do not want to fly over congested areas, or bear the regulatory or financial burden of licenses and planes certified to do so. I simply want to fly a safe, two-place PPC with a recreational passenger over unpopulated areas. PPCs are inherently speed limited, so increasing fuel and weight limits of the present FAR 103 would increase pilot and passenger safety without any danger increase to the general populace.

Comment NO: 1423	User Name: biz451

NOTE: The following message may be a duplicate-- the original comment was incorrectly posted with the "Agree" option, when I meant "Disagree" Generally, I disagree with how the proposal addresses (and eliminates) Part 103s training exemption for powered parawings (PPCs, PPWs). Rather than requiring pilots who want fly a two place PPC and carry passengers (*not* for training or hire) to enter a new level of bureaucracy, it would be better, easier, and simpler to amend Part 103 to allow pilots with training exemptions (or an updated equivalent) under Part 103 to carry recreational passengers, fly two-seat planes up to 600 lbs unladen weight, and carry unlimited fuel. For my part, I do not want to fly over congested areas, or bear the regulatory or financial burden of licenses and planes certified to do so. I simply want to fly a safe, two-place PPC with a recreational passenger over unpopulated areas. PPCs are inherently speed limited, so increasing fuel and weight limits of the present FAR 103 would increase pilot and passenger safety without any danger increase to the general populace.

Comment NO: 1425	User Name: boport

No Comment

Comment NO: 1428	User Name: hhfmfg

I Fully Agree

Comment NO: 1431	User Name: KenMcWhorter

No Comment

Comment NO: 1432	User Name: KendallDucote

I copied Biz451's post because it says exactly what I feel. Generally, I disagree with how the proposal addresses (and eliminates) Part 103s training exemption for powered parawings (PPCs, PPWs). Rather than requiring pilots who want fly a two place PPC and carry passengers (*not* for training or hire) to enter a new level of bureaucracy, it would be better, easier, and simpler to amend Part 103 to allow pilots with training exemptions (or an updated equivalent) under Part 103 to carry recreational passengers, fly two-seat planes up to 600 lbs unladen weight, and carry unlimited fuel. For my part, I do not want to fly over congested areas, or bear the regulatory or financial burden of licenses and planes certified to do so. I simply want to fly a safe, two-place PPC with a recreational passenger over unpopulated areas. PPCs are inherently speed limited, so increasing fuel and weight limits of the present FAR 103 would increase pilot and passenger safety without any danger increase to the general populace.

Comment NO: 1433	User Name: buster

The ability to use a drivers license as the to satisfy the medical requirement for sportpilot priviliges constitutes the very heart of this NPRM. Without this provision the NPRM would be a wasted effort, and would not produce the desired increase in the numbers of certificated pilots.

Comment NO: 1435	User Name: buster

Good rule. This should succede where the Recreational Certificate failed. Go for it

Comment NO: 1439	User Name: bliddel

In general, I agree enthusiastically. I take exception to some arbitrary provisions (restrictions) which are apparently not well founded, not well considered, or not defensible from any objective demonstrable need. I will comment on those elsewhere.

Comment NO: 1442	User Name: buster

No Comment

Comment NO: 1444	User Name: buster

This proposal will succeed where the Recreational Certificate failed. Well thoughtout and researched. Go for it!

Comment NO: 1446	User Name: sleepy

I feel this proposal throws way too many restrictions and rules on the light sport pilot end of aviation. I have been flying powered parachutes for nearly 300 hours and I feel proposed requirements in the areas of maintanance, inspection, instruction will deter some from continuing to fly ppcs and other light ultralights. Some due to increased expense and some because of greater requirements. I don't feel it is useful to lump powered parachute and other light, slow ultralights into the Sport Pilot class. It seems to me that what many PPC pilots and I would like to see is a change in Part 103 to address a reasonable increase in weight for safety reasons and addressing the ability to carry a passenger for recreational purposes. I feel this could easily and safely be done with simple modifications or exemptions to part 103.

Comment NO: 1451	User Name: Marschner

I believe the present conditions on the certification of new aircraft have become so expensive, particularly in regard the unit cost given that fairly small numbers of aircraft will be built, that we find that aviation in new aircraft is limited to a few very rich individuals and the rest of us need to fly very old equipment.

Comment NO: 1456	User Name: llhoedl

I disagree with most of the proposal as is

Comment NO: 1465	User Name: Parris

Greatest rule in years. It will help to bring general aviation back into the new century out of the era of the 30's to 60's. This rule will help bring receational aviation into line with other forms of recreation.

Comment NO: 1481	User Name: tuna

Additional required training is wise. Additional expense will limit participation. Amount of training required for powered parachutes is too long.

Comment NO: 1492	User Name: reelliott

The Sport Pilot/Light Sport Aircraft proposal is well thought out and should be adopted. I believe that a renewed interest in aviation may result, with a potential increase in spending for aircraft and training.

Comment NO: 1493	User Name: slowflyer

The thought occurred to me by reading many of the comments to the FAA on the Sport Pilot NPRM, that GA pilots like this NPRM but want more weight and speed. Fat ultralight pilots are concerned about costs and training. Why not satisfy everyone and divide Sport Pilot in three distinct categories: (it could be called the '10-20-30' rule). 1) Light Aircraft Category o Single seat o 254-500 lb empty weight limit o 10 gallon fuel limit o 85 mph top speed limit o maintenance performed by pilot owner or authorized dealer o no airworthiness certificate o written test o flight check o drivers license medical o 10 hours training for new pilots o U-Numbered (special designation for fat ultralights) 2) Medium Aircraft Category o 1 or 2-seat o 500-1200 lb empty weight limit o 20 gallon fuel limit o 115 mph top speed limit o maintenance performed by trained mechanic or authorized dealer o FAA compliant for new aircraft o airworthiness certificate issued by FAA for new aircraft (existing trainers exempt) o written test o flight check o drivers license medical o 20 hours training for new pilots o BFI-AFI ultralight instructors grandfathered into category o Training by BFI-AFI flight instructors after testing with option to become CFI's with incentives o N-Numbered 3) Heavy Aircraft Category o 1 or 2-seat o 1200-2000 lb empty weight limit o no fuel limit o 160 mph top speed limit o maintenance performed either by trained mechanic or authorized dealer o FAA compliant for new aircraft o airworthiness certificate issued by FAA o written test o flight check o drivers license medical o 30 hours training for new pilots o Training by Certified Flight Instructors o N-Numbered FAA may determine amount of checkout time for pilots with higher ratings to fly lower categories.

Comment NO: 1495	User Name: route6t6

I think this is a very important thing to happen in regard to promoting General Aviation.

Comment NO: 1497	User Name: FSJ

No Comment

Comment NO: 1498	User Name: jedeuce1

i hope that this will lower GA costs for planes, fuel due to more people getting into flying

Comment NO: 1504	User Name: divad

Excellent work. Thank you. Cant please all the people all the time. Only protest is the 115 Knot max speed is regressive and not in step with technology or the other nations having simular rules.

Comment NO: 1509	User Name: johnwi

No Comment

Comment NO: 1515	User Name: bjmoore

What I anticipated as a good rule from initial breifings before the NPRM appears to be a cumbersome, overbearing rule for those pilots that meet all part 103 limitations, with the exception of the weight limitation.

Comment NO: 1528	User Name: cortngrant

I totally agree with the FAA proposal. The only problem I see is enforcing the program being so many ultralight pilots are not in controlled areas. Even those who are, will probably fly illegally What is needed is volenteers to oversee the program.

Comment NO: 1529	User Name: James Paul

I agree but would increase the gross weight to include certificated aircraft otherwise within the parameters of Sport Aircraft as defined in the NPRM, such as Cessna 150/152, Tomahawk, Beech Skipper, Ercoupe and the like. They would be perfect Sport Aircraft for those no wishing to buy or build new experimental or uncertified aircraft.

Comment NO: 1534	User Name: sam

I agree with and wholeheartedly support this proposal. I've seen some comments that imply that the UL community was overlooked during the development of this proposal. The proposal should certainly not do harm to the UL community. Let's continue to give constructive analysis so that a good rule can be finalized. The proposal won't please everyone, no matter how it's written, but it should do the most good for the most people.

Comment NO: 1535	User Name: Bill Bardin

Disagree. USUA only asked for regulatory assistance to keep in step with technology and international regulations. While ruling can assist those with a general aviation desire, it is extremely anti-ultralight aviation, especially for myself, a full-time ultralight instructor.

Comment NO: 1558	User Name: LenSpencer

I generally agree with the proposal as is, with a few exceptions. While the proposal directly addresses kit-built and "ready-to-fly" models, there doesn't seem to be any mention of "plans-built" aircraft, such as the Pietenpol Aircamper and Volksplane VP-1 just to name a few. Also, the proposal as written would require a separate signoff for each specific make and model of aircraft, which to me seems somewhat cumbersome, plus the question of how that would be accomplished in the case of single-seaters.

Comment NO: 1559	User Name: ultraj51

best proposel in 50 years

Comment NO: 1583	User Name: Catalina36

This is the most important proposal for the advancement of general aviation in the last 50 years. The FAA serves the needs of all Americans, and it should be the goal of the FAA to open up America's skys to as many people who can safely learn to fly. I hold a private pilot license, but obtaining it was more costly and time consuming than it should have been. A major goal of the FAA should be to open up the world of flying to all who meet minimum flight qualifications rather than to restrict our airspace to only those who are professionally prficient. The future of American air development and superiority depends upon our getting as many young people into the air as quickly and as inexpensively as possible. Safety sill never be perfect, and there will always be accidents. But is would be foolish to sacrifice the good in an unobtainable quest for the perfect. So anything we can do to get people and aircraft into the air with a minimally acceptable level of safety is highly desirable.

Comment NO: 1589	User Name: harveyking

I agree in general as it applies to forming Sp and LSP catagories.

Comment NO: 1596	User Name: davidbauch

The Sport Pilot Proposal appears to me to be written by the same demographic group that I have met at most EAA functions, that is; General Aircraft pilots, mostly male, mostly over the age of 60, mostly with a GA mindset. That in itself is not all bad as their experience and safety record is impressive. Some admit they do not fly so much now as they would like to as it is so expensive to own and maintain an airplane. Unfortunately, many know very little about, and have no interest in, Ultra Light Aircraft. If the FAA is truly interested in encouraging younger people with limited resources to get into flying, then additional input from the fastest growing segment of the aircraft industry, the ultra light community, needs to be seriously considered. If the Proposal creates unnecessary expense and unnecessary regulatory burdens on new pilots, then it will fail to meet expectations.

Comment NO: 1612	User Name: ktantum

No Comment

Comment NO: 1614	User Name: JSTO1

The proposal is in best interest of public and will provide great economic benefits to both business and government. The weight and speed limitations are excessively restrictive. The weight should be increated to at least 1700 pounds in order to include aircraft like the Cessna 152. This would encourage additional participation and also expand the pool of candidates for insurance purposes. The speed criteria should be limited removed and replaced by a horsepower limit of about 180 HP. This allows the designers the flexibility to innovate for efficiency and safety. It also supports additional market opportunities for existing manufactures to sell current products on known reliability. Limiting the HP also limits the margin of safety for instances where short field preformance is needed. The FAA initiatives like Capstone are aimed at improved safety, lower costs, and more efficient use of airspace. The addition of the Sport Plane category will open up opportunities for individuals not close to large metropolitan areas to benefits of air travel at reasonable costs.

Comment NO: 1615	User Name: hosinmigs

No Comment

Comment NO: 1616	User Name: hosinmigs

I think this proposal will fill a void in the industry.

Comment NO: 1621	User Name: mbjensen

I have heard nothing but positive from everyone I've talked with

Comment NO: 1622	User Name: awilliams

No Comment

Comment NO: 1623	User Name: awilliams

I think it is a reasonable proposal in general.

Comment NO: 1624	User Name: awilliams

No Comment

Comment NO: 1628	User Name: live2av8

Something like it is needed for the light end of GA, but it won't work when there's a mandatory inclusion of "ultralighting" as we know it today. If Sport Pilot is truly needed it should be allowed to become successful on it's own merits, and not have to FORCE people into it. -live2av8-

Comment NO: 1647	User Name: TOMS

I think this is a step in the right direction allowing people interested in light aircraft to be able to fly with a buddy and enjoy the pleasures of flying as a sport that dosen't cost an arm and leg

Comment NO: 1667	User Name: kerrylamb

I am interested in flying as for personal travle with my wife. This proposal would appear to be an inexpensive way to get involved and then perhaps upgrade my training and license as time and needs dictate. I feel this will help to promote general avation by bringing more pilots who are only interested in fair weather flying for sport and travel. Thanks

Comment NO: 1673	User Name: Delk

I've been a private pilot since 1977, flying for recreation and short business trips. During those years I've watched the slow death of American general aviation. This is what it is going to take to reverse the trend. It may not be all that is needed, but it is a significant first step. The two most important aspects of it are the DL medical and the special certification for light sport aircraft. Without both, the number of pilots and aircraft with continue to decline. The remainder is just details. Time is of the essence. Unless something is done quickly, the geneal aviation constituency will drop below the level at which it is able to defend itself. Please implement this proposal at the earliest possible date.

Comment NO: 1674	User Name: Goflyslow2

All of the comments re; increased weight for LSA are in fact for the same reasons as the requests for an increase in weight for Part 103. Most of the positive responses to Sport Pilot are only in consideration of the Driver License Medical. AND, to continue to fly the SAME aircraft that they have been flying ie; Cessna 150's, 152's and Erocoups. Give these guys D.L med for Recreational pilot....their going to do it anyway.... Increas the weight limitations for Part 103 and maintain the Training exemptions.

Comment NO: 1675	User Name: john brady

yes

Comment NO: 1691	User Name: garyo

We must look at the reality of over 10,000 existing aircraft and the industries that surround them. This rule as written will destroy this industry since it is hanging by a thread as it is. To do something to improve the bottom level aviation will have to be something that will support these people in their fly for fun sport. You cannot dispute the saftey records between this group and general aviation. This self regulated, for 20 years, group has demonstrated some very impressive records.

Comment NO: 1692	User Name: flyingfree03

Yes, In general I strongly agree. The FAA surprised and impressed me with this proposal. However I have some concerns: Why is a two seat U/L trainer OK now and for three years, then suddenly not suitable?? Doesn't make sense to me, we need more instructors/trainers not less, to few now. The proposal needs the support of the maximum number of U/L pilots and instructors as possible. Make the transition path a positive one for them. Also I don't think 2,000 AGL over mountains is enough for safety.

Comment NO: 1695	User Name: Ivan Mrazek

I disagree, since this proposal is written in design to please some members of flying community, it will damage ultralight aviation by making it too expensive and add another lavel of bureaucracy. Leaving the ultralight training exemptions in place(worked fine for so many years) will be safer and burden limiting approach.

Comment NO: 1697	User Name: edair

I Agree. I am in support of the proposed legislation. I think that the Sport Aircraft concept will help general aviation, by increasing the number of pilots. This will in turn help keep small airports operating, which would provide both safety and economic benefits.

Comment NO: 1698	User Name: roycaton

I very much agree. This is great for aviation. Flying should not be so difficult and expensive that only a small percent of us can fly.

Comment NO: 1705	User Name: skyking

This proposal is not the answer for Fat ULs. It is way overboard with regulation and cost. It simply is not needed. The original USUA proposal would have been a better and less costly solution for the ULs SP could very well be the beginning of the end for ULs and part 103

Comment NO: 1706	User Name: skyking

This proposal is not the answer for Fat ULs. It is way overboard with regulation and cost. It simply is not needed. The original USUA proposal would have been a better and less costly solution for the ULs SP could very well be the beginning of the end for ULs and part 103

Comment NO: 1707	User Name: rdmm42r

I agree ,this could boost the future of aviation . I would like to see the Wt.limit increased to take in the basic trainers as Piper Colt, Clipper, Cessna 120,140, 150 ECT.

Comment NO: 1715	User Name: slawek

I totally DISAGREE with the proposal as it pertains to ultralight operations. In particular, I am opposed to elimination of Part 103 exemptions. I am a hangglider pilot living in a positively nonmountainous part of the country (Midwest) where aerotowing is the best and the safest means of launch for hanggliders. I've been flying hanggliders for years and I'm a part of a fairly large hanggliding community in the region. Taking aerotowing away from us would practically kill our sport everywhere between the Appalachians and the Rockies. Also, taking away our right to take on passengers (tandem flights) would deny us the safest means of training new pilots not to mention make it impossible to share the unimaginable, dreamlike feeling and beauty of nonpowered, cockpitless, quiet flight. The rest of the proposal may well contain some beneficial changes. This is definitely NOT one of them. Please do not take away our freedom to fly!

Comment NO: 1718	User Name: bleddy

The proposal makes unneeded changes to the Part 103 instructor exemptions. The safety record of affiliated instructors has been demonstrated over years of experience.

Comment NO: 1723	User Name: Goflyslow2

The Driver License medical initiative should be a stand alone proposal. It should not be tied to 120 plus pages of regulations. It could be worded as easily as ; Private and Recreational pilot without current medical authorization may fly two place VFR aircraft with the following limitations ie;(wt.- speed - stall - gear- etc.) To include new students, Training for Rec. Pilot should be allowed without medical. "Supervised Solo" required of Students without medical. License endorsment states "limitations without medical"

Comment NO: 1728	User Name: mav

I agree in general and applaud the FAA for its reduction on restrictions to sport flying. Had I sat in comittee with the drafters I would have suggested many modifications to the proposed rules but overall it will increase freedom of flight.

Comment NO: 1733	User Name: evergreen

I heartily agree with the intent and spirit of this proposal. It is long overdue in my opinion! The aviation industry (including the FAA) has raised the bar so high over the years that our children dispair of ever being able to afford to learn to fly. This proposal is a step in the right direction in addressing that problem. Besides being an important industry and a significant component in the transportation infrastructure in this country, the ability to fly is an important freedom to be protected from many forces both within and outside of this country. It has become a popular target for these forces partly because of the perception in the mind of the public that flying is a priviledge enjoyed only by a very few rich individuals. This proposal is a step toward addressing the falicy of that perception.

Comment NO: 1742	User Name: brunerw

I agree generally, with some reservations. The "aviation-mindedness" of the American people was a large part of our country's economic and military success in the 20th century. As far as the rule increases the the public's access to aviation, it makes our continued success more likely in the 21st. As far as it increases restrictions on access to the air (i.e., hang glider towing, new rules for ultralights) it makes the continuation of our dominance in aviation less likely.

Comment NO: 1746	User Name: rwinder

No Comment

Comment NO: 1747	User Name: Goflyslow2

PERSONAL RESPONSE TO THE SPORT PILOT NPRM John Ballantyne April 27, 2002 Docket Management System U.S. Department of Transportation Room Plaza 401 400 Seventh St., SW Washington, DC 20590-0001 Re: Certification of Aircraft and Airmen for the Operation of Light-Sport Aircraft; Proposed Rule Docket No. FAA-2001-11133; Notice no. 02-03 Commentor's background I have been involved in aviation all of my life of 56 years. My father and mother flew and we always had a family plane. I first soloed an airplane (Cessna 140) when 16 years old in 1962. I began hang gliding in 1977 and shortly thereafter became part owner of the dominant hang glider training school in southern California. For 3 years I taught ground school and primary flight training, and managed the facility at Playa del Rey, California. Circa 1979 the United States Hang Gliding Association (USHGA) formed a Powered Hang Glider Division for which I became a ground and flight instructor. Also for USHGA, John Lake and I conducted USHGA Powered Hang Glider Instructor seminars (ICP). In 1979 I was president of the Southland Hang Gliding Club which was the forerunner of the United States Hang Gliding Association. In 1980 I founded, owned and operated UltraSport, Inc., the first full service flight training and retail center for powered ultralight aviation in the Los Angeles area. I authored flight instructing programs and techniques including a tethered flight simulator that were publicized throughout the aviation industry. During this time I became one of the first FAA Safety Counselors for powered ultralights. Based on my experience and industry notoriety, the Experimental Aircraft Association invited me to be the founding president of their Ultralight Division circa 1982-1984. I served in that volunteer role until shortly before EAA closed the division in 1984. At AOPA Air Safety Foundation I wrote the original FAA recognized ultralight pilot/instructor training program from which all others have been derived. This was shortly after the issuance of FAR Part 103 (Ultralight Vehicles). There was close cooperation with FAA Flight Standards and FAA Accident Analysis. I am the founder and past president of the United States Ultralight Association, Inc., the largest association devoted entirely to ultralight aviation in the world. On behalf of USUA I have written many petitions and exemption requests to FAA and developed member support programs of all kinds. I have served on the Board of Directors for the National Aeronautic Association for over 10 years. USUA's highest honor, the John Moody Award for outstanding contribution to ultralight aviation, was awarded to me in 1995. I am privileged to have received in 1999 the highest international microlight award, the Colibri Diploma as "the pre-eminent leader for ultralight and microlight aviation in the United States for 27 years." Only three other individuals have ever received a Colibri Diploma, and I am the only American. My certificates include FAA commercial pilot and instructor—glider and private privileges for airplane (ASEL) with an instrument rating, USHGA Master hang glider pilot/instructor, aero-towing exemption holder, and seminar presenter, AOPA

Air Safety Foundation ultralight pilot, instructor, seminar presenter and USUA Ultralight Flight Instructor #1 and seminar presenter. I am the only individual to have received an FAA Commercial and Flight Instructor certificate by flying a trike (weight-shift control). I am the only individual who participated in every ARAC meeting from which Sport Pilot (NPRM 11133) has come. (Even the primary FAA representative missed a couple.) Finally, I care deeply about ultralight-type aviation, hang gliding and soaring, and hope to not only influence FAA but to influence others, too. Please consider my comments and agree in writing to FAA on those points you find valid—especially the two-level approach. It will take many comments to sway FAA to draw the ultralight exemptions into a second Special FAR, so I invite you join with me. Historic Overview FAA has made numerous attempts to resolve regulatory problems associated with their inability to keep up with the growing interest in air sports aviation in general, and ultralight aviation in particular. I have observed and participated in the development of these regulatory attempts by FAA including Ultralight Vehicles, Recreational Pilot, Primary Category Aircraft, Sport Plane and now Light Sport Aircraft/Sport Pilot. In the past 15 years FAA organized research groups (paid by public funds) including a major regulatory review by Booze Allen Hamilton in 1988-1989 and the Aviation Rulemaking Advisory Committee (ARAC) Ultralight Working Group from 1993-1999. In every case so far FAA has repeatedly (and admittedly) missed the regulatory need. This is simply because they do not comprehend the nature of the aviation segment they are trying to regulate. Over the past 30 years the convenience of jet powered commercial aircraft, combined with a vastly improved roadway system for modern automobiles, has gradually eroded the perceived utility of the four-place family airplane. At the same time the evolutionary trend has gradually increased the relative value of aviation sports where participants choose craft that often appear unconventional but fly well and are too slow to be used for reliable transportation. They are for fun flying. They cost no more than their motorized counterparts in water and land sports. Flying, especially at slow speeds and in open cockpits, is tremendously rewarding. It is like you are flying. This trend is not a reinvention of airplanes so much as an expansion of recreation. It is intensely personal. When allowed to let go of an unspoken need to regulate aviation as a transportation utility, the practical side of the regulatory approach changes. Risk management is different for pilots slow speed and low inertia aircraft. Danger tends to develop more slowly allowing the pilot to take corrective action based on a thought process more than relying on checklists. Therefore ultralight pilot training programs weight the decision-making process more than the emergency checklist type of approach required when flying relatively fast, heavy aircraft. FAAs focus on transportation is precluding a clear view of the issues in air sports. NPRM 11133 says in part, "**There is uncertainty as to what extent the NTSB's database has fully captured those accidents involving unregistered light-sport aircraft over the past 10 years... There is uncertainty as to what extent these exemption holders' databases have fully captured those accidents for unregistered light-sport aircraft over the past 10 years... Because the accident databases listed above may not capture all relevant accidents, the potential safety benefits estimate for light-sport aircraft may be understated." The existing regulatory system does not provide for a reasonable path of entry and progressive development for ultralight/microlight pilots and instructors. The result is safety problems that are hidden from statistical analysis because FAA and NTSB ignore most microlight accidents (i.e. experimental-aircraft-with-ultralight-operating-characteristics). This is a serious matter. Some individuals have unnecessarily died because the reporting systems have failed to reveal common causes of accidents from which others could learn and improved regulatory programs created. It also prevents a reasonable business environment on which to base an industry. The cost of being unresponsive to this evolutionary trend is measured in wasted money and lives. Yet, interest in microlight aviation is very strong in America and elsewhere around the world. In 1994, twenty-five countries reported to the international microlight commission more than 82,000 active pilots and 47,000 microlights that flew more than one million flight hours. One hundred eleven manufacturers reported a production total of 4,954 new planes just during that 12-month period. Each year the United States Ultralight Association, Inc. receives growing numbers of inquires by those who hope to fulfill life-long dreams of personal flight. These numbers illustrate that many individuals worldwide are attracted to aviation sports for the deep fulfillment and personal accomplishment which fun flying offers. ARAC Aug 17, 1993-Ultralight Vehicle Working Group FAA created a working group for

"ultralights" on August 17, 1993. The purpose was to address the petitions of the USUA and generally to address the cadre of air sports aircraft and pilots that had developed during recent history. FAAs NPRM 11133 reports that it considered all, and incorporated some, of the ARAC committee recommendations. But there is much more to the story. First ARAC Recommendation (Unanimity!) After many meeting and long discussions, the Ultralight ARAC group met in December, 1995, and proudly voted to hand the draft NPRM to FAA. The agreement was not merely "consensus," but unanimous—no dissenters or withheld votes whatsoever. Interestingly, however, the proposal then was very different. It recommended to FAA: An aircraft maximum weight of 992 pounds (450 kilos), and Stall speed of 35 kts, No flights over congested areas, and to Otherwise resemble ultralight regulation (Part 103). An "Umbrella of Standards" would permit any form of new aircraft and pilot programs without rulemaking—even those kinds not yet invented. Every group agreed to recommend no changes to part 103, ultralight regulation. A separate FAR part was recommended and it would be named "Microlight." What happened when ARAC unanimously (and very proudly) agreed to hand the finished recommendations NPRM to FAA just before Christmas in 1995? Silence. After some weeks had passed there came reports of FAA holding private meetings with notable individuals from general aviation, and the Experimental Aircraft Association in particular. After a full year of stalling, FAA began to call another set of ARAC meetings. By then most of the sporting groups had lost faith in the sincerity of FAA and the meetings became dominated with associations such as EAA, Aero Sports Connection, Capella and the Small Aircraft Manufacturers Association. They gained a majority of voting power and created a new recommendation with much higher weight, speed and pilot privileges. Sometime between the end of the ARAC meetings and the release of Sport Pilot (NPRM 11133), FAA internally decided to again increase the weights for some reason. Only that second, final recommendation is reported by FAA. FAA says, "The ARAC working group submitted its recommendations to FAA for review in July, 1998. Much of FAA's proposal is based on ARAC's sport pilot certification recommendation..." The FAA did not adopt even one portion of the original, unanimous ARAC recommendations. But they were valid recommendations and should not be lost just because they weren't what FAA wanted to hear. ARAC did not recommend use of FAR 61 & 91 FAA writes, "The ARAC recommended FAA include detailed privileges and limits in part 61…" This is incorrect. The ARAC group first recommended a new regulation (FAR). FAA made it clear that that was not an option, so the ARAC group reluctantly compromised by saying that FAA could place it as they wished so long as the tone, feel and intention was met. FAA immediately responded that Parts 61 and 91 would be the location, and now reports to the public that it was an ARAC recommendation. International Harmonization Issues Additionally, the international microlight community has provided (1994) written encouragement for FAA to adopt international microlight aircraft parameters which were exactly included in the first ARAC recommendation. FAA has completely ignored this recommendation by the principal international representative group and instead refers to a few individual countries that have the expanded definitions that apparently better suits FAA intention. The increases from 992 pounds maximum to 1232; and especially the increase from 35 knot stall to 44 knot stall, is significant and in my experience has a profound effect on aircraft airworthiness and pilot training requirements. FAA simply states that, "[International harmonization]…is based on the premise that the number of the requirements contained in the proposal (namely, aircraft certification standards) essentially mirrors those that already exist internationally." This is insufficient justification to my mind. Aviation Disciplines Ultralight aviation is a cultural matter as well as technical specialty. Those who fly for fun have different regulatory needs than those intending to fly traditional aircraft for personal transportation in the airways and over cities. This cultural issue may again be being submerged under the push for a reduced medical and cheaper aircraft for existing pilots, the apparent thrust of Sport Pilot (NPRM 11133). FAA staff are, in general, very educated and caring people. I enjoy knowing many of them and like the debating event that often occurs when I am in their Washington DC offices. FAA headquarters is less than 50 miles from my home, so I visit FAA whenever it seems advantageous. However, not one single FAA employee within flight standards headquarters has personally flown ultralights on a regular basis for recreation. Flight standards is where pilot and instructor programs are created. The vacuum of actual, personal involvement in ultralight air sports has meant that hearsay and preconceived notions have

become the basis for regulatory "improvement" at FAA headquarters. FAA focus on transportation is eclipsing an accurate view of air sports aviation. Because they do not understand this aviation group, their regulatory approaches have not worked well. The primary FAA representative to the Sport Pilot ARAC meetings retired shortly after the meetings stopped. The very nice and capable person who is the new Sport Pilot coordinator and spokesperson never actually attended any sport pilot ARAC working group meeting. In fact no FAA employed now involved has first hand knowledge of the political and cultural issues that were discussed for so many hours. It is better when the regulators participate in the community to be regulated. Surely the airlines would not stand for a regulatory department of individuals who had no commercial aviation experience. What if a town council in Iowa regulated a town in Oregon? I don't think so. No FAA employees in Flight Standards have yet been ultralighters, and none have regularly personally attended the ARAC meetings. I believe this reduces the quality of rule proposals such as NPRM 11133, and makes comments from the aviation community more important. Personal Recommendations Sport Pilot: A Two-Tiered Approach is Required I support a process for the slower, simpler fat single and two-place ultralights, and also I do not object to the FAA proposed higher parameters as they may also benefit some of my fellow aviators. I agree with USUA which believes both things should take place, both methods through 2 special regulations (S-FARS)—one S-FAR as now proposed and a second S-FAR associated with ultralight regulation to support the fat and two-place ultralights as proposed originally by ARAC when it was composed of more air sports groups. Basic proposal is OK for existing FAA pilots Overall, the existing FAA proposal would be helpful to existing FAA licensed pilots and instructors. Some want to increase their flight privileges to include faster aircraft and overflight of cities. The proposed rule could provide that. I also believe the definition of the aircraft which a sport pilot could fly should be increased enough to include aircraft such as Cessna 150, 152, Piper Tomahawk, and other common 2-place general aviation aircraft. Finally, FAA might be wise to simply incorporate these changes into Recreational Pilot as FAA so strongly lobbied for during many ARAC meetings. The trick for FAA will be to adopt programs with these broad pilot privileges that end up being significantly "less" than the long-standing private pilot certificate (the downfall of Recreational Pilot). Of special significance and commendation are the proposed new categories of aircraft for powered parachutes and trikes (weight-shift to FAA). This is very important as it would allow full private piloting privileges and would not limit powered parachutes and trikes to only 2 seats. If, as I fear might be the case, the sport pilot certificate gets too close to the private certificate, applicants could select to go directly to private while being trained entirely in powered parachutes or trikes as they choose. This may end up being the most successful part of the entire proposal related to pilot and instructor certification. Forcing all fat-single and two-seaters pilots into higher, further and faster aircraft is excessive, unnecessary and dangerous. Many with whom I have spoken only want reasonable regulatory avenue to fly "fat" single and two-place ultralights for recreation. USUA and other groups have repeatedly petitioned FAA about this. FAA's proposed requirement for every pilot and instructor of fat single seaters and two-place ultralight trainers go back into training for 130 mph aircraft is simply overkill. Each pilot would have to pass a comprehensive written test on general aviation rules (parts 61 & 91), an oral examination and flight test using some notoriously difficult to fly aircraft which could have top speeds over 130 mph and fly over our cities and towns. Existing ultralight operations demonstrate that many individuals prefer to give up such transportation-oriented speeds and over-city flights in trade for more recreationally oriented training programs such as now in use by several ultralight associations. Solution: Second level tier What I believe FAA should do is to create a two-tiered approach: sport pilot as proposed, and a second tier to address fat single and two-place ultralights. This mirrors the original ARAC recommendation for a separate FAR. Just as FAA proposes to attach a special federal regulation (S-FAR) named Sport Pilot to existing regulations of parts 61 & 91, I recommend that FAA attach a second S-FAR, named Ultralight Aircraft, to part 103 (Ultralight Vehicles). Two-seaters for training and recreation, "fat" single-seaters Here is where the original, unanimous, ARAC recommendation can again be utilized. Bring into the second level tier the two-place training programs, recreational use of two-seaters, and a modestly increased definition for single seaters (H. O. Scale) as has been discussed and requested for decades by USUA, the international microlight commission, other air sports organizations and

contained within the sport pilot ARAC's first recommendation. Two-seater Ultralights FAA mistakenly reports that, "… in 1995 when it issued the first exemption from part 103 for training." [Emphasis is mine] This is a very inaccurate and seriously misleading statement by FAA. FAA actually began issuing exemptions allowing two-seat ultralights for training in 1983, only 9 months after issuing ultralight regulation (part 103) in October 1982. FAA has repeatedly renewed these exemptions to 4 or 5 various organizations every two years thereafter for almost 2 decades. Interestingly, FAA also states, "Although we [FAA] issued exemptions to temporarily resolve the training issues, to extend them on a long-term basis would be an inappropriate use of the exemption process [emphasis is mine]. 'The FAA believes that a permanent and appropriate level of regulation is necessary." I don't know how many years FAA has to continuously issue an exemption before it is considered "inappropriate use of the exemption process." But nineteen consecutive years of uninterrupted exemption renewals for multiple associations surely demonstrates the importance and significance to both FAA and the ultralight community for the need for two-place "ultralights." It also illustrates that the ultralight community has, in fact, operated two-seaters although the actual ultralight rule limits ultralights to only one seat. In practice FAA has (sensibly) allowed two-seaters since the beginning. It is important to keep open the option for the training programs developed around two-seat ultralights. And through the years it has become clear that those who were trained in two-seat ultralights learned to fly two-seat ultralights. The Solution: FAA should add a stage, or tier, of regulation to the proposal The additional S-FAR should be similar to the S-FAR now proposed by FAA in that the Ultralight Aircraft S-FAR would provide FAA certificates for pilots and instructors, and "N" numbers for the aircraft. The written, oral and flight tests would be based on existing ultralight programs and enforced by FAA. Administration of the program might be, or might not be, through membership associations. The operating rules would come from part 103 including prohibition on flights over congested areas, not into ATC controlled airspace without prior permission, and no night flying—exactly as ultralight vehicles are presently limited. Now proposed by FAA: I recommend that a second-level be added: This two-tiered approach encourages the FAA "Sport Pilot" to be finalized while permitting ultralighters to gain the authority for two-seat recreation use under the more restrictive ultralight regulation. This second option is critical for those who want to fly today's ultralights and do not mind being relegated to rural areas. I also recommend that FAR part 103 (Ultralight Vehicles) to be left unchanged. FAA Proposed Pilot/Instructor Program Requirements Are Impossible to Evaluate Sport pilot and instructor training programs are impossible to evaluate because they do not exist. FAA says that it will take from industry programs when establishing the standards (Pilot Testing Standards, PTS). But will FAA derive a program significantly different that private pilot? Only time will tell. Airworthiness "Consensus Standard" Impossible to Evaluate It is not possible to evaluate the contents of the airworthiness "consensus standards" for light sport aircraft as proposed by FAA until such standards exist. FAA words the NPRM to almost lead the reader to believe that the manufacturers will have say over the contents of the program, but FAA certainly has the last and final approval authority. How appropriate and reasonable will FAA be? We cannot know until we see a finished consensus standard. Therefore ultralight manufacturers, the FAA, and other affected parties should get together and create and publish the industry consensus standard before the public is obligated to respond to the NPRM without a full awareness of the ramifications of the light-sport aircraft certification process and costs. Aircraft Options Need Not Be Withheld Ultralight aviation has hosted vehicles with retractable land gear, variable pitch propellers, multi engines, and even an occasional pure-jet engine. FAA now proposes to make those combinations unavailable to sport pilots even though they will "be trained to a higher standard." Why should this be? I am aware of no evidence that these options have caused significant or wide-spread safety problems in single and two-seat ultralights. Even model airplanes now have functional turbine engines. Some designers are talking of ultralight-type aircraft with multi engines (maybe 6, 8 or more engines) to minimize the dependence on any one engine. Retractable landing gear and variable pitch propellers are not complex devices only for those pilots with superior intelligence. Besides, some ultralighters have superior intelligence. The largest reported complexity with retractable landing gear is simply remembering to put it down before landing. Let's let those who are willing to accept additional training and receive an instructor's log endorsement utilize these devices if they wish. Include all Sport Aviation

Segments In addition to the groups addressed by FAA in NPRM 11133, I would like to specifically recommend that at least the Ultralight Vehicle SFAR include: gyroplanes (one and two-seaters), tandem hang gliding, tandem powered paragliding and aero-towing of hang gliders which have somehow been left out of FAAs NPRM 11133. These activities have taken place under FAA exemption for many years and there is no basis in safety to terminate the activity of which I am aware. By issuing and reissuing exemptions for these purposes, FAA implies that aero-towing, two-place training and recreational flying in all forms of "ultralight" flying, including powered paragliding are important. This is correct. Also consider the fact that the tandem exemption for hang gliding includes the option of passenger flights for recreation. This has caused no problems. These items should be perpetuated by inclusion in the Ultralight Vehicle SFAR as they are allowed by exemption today. To leave out these segments is to create a safety problem related to training because it will force single place training to be the only option. This is where the instructor (if there is one) stands on the ground and coaches (by hand signals or radio) the student's first flights. Surely FAA does not deliberately intend to do this. Category/Class Checkout Will Satisfy Safety Issues Pilot and instructor make/model-specific checkouts is unwarranted based on my considerable experience in providing transition training. Transition training is sometimes important, but it need not be federal law. The requirements within an Ultralight Aircraft (SFAR) instructor "aircraft" check out should be identical to what it is under the several training exemptions. Namely this is category/class checkout by a qualified instructor, but no make/model specific requirement. Again, accident data supporting an increase in existing requirements for the same aircraft is non-existent (remember the tier named Ultralight Vehicle SFAR is limited to only those two-place craft now known as ultralight trainers). Closing I appreciate the opportunity to make this personal comment for all to read. I hope it influences FAA. Too often my personal work in "industry and government" working groups has suffered from major compromise and political shenanigans. I love air sports aviation. What I recommend is from my deepest convictions and based on thousands of hours of flying and teaching. John Ballantyne

Comment NO: 1750	**User Name: BigSkyAviation**

While I think a new certification of factory-built light planes is fantastic it should not be tied in with a major change to the pilot certification system. It is my opinion the the new sport pilot license should be scrapped and a no-medical day-VFR rec license to fly non-complex aircraft should be instituted instead. This would follow the current system of degrading a pilot's license as his medical degrades. Most current non-complex certified planes have the same speed as the proposed LSA planes and are owned by pilots at risk of losing their medicals. Ultralight pilots who cannot get a 3rd class medical would have the choice of moving up into a LSA or non-complex plane. Ending a part 103 training system will have the effect of increasing 103 accidents. The 103 training system has only one problem - the lack of restraint by the orgs that issue ultralight trainer registrations to keep the trainers within the limits of the exemption. I feel that this is a result of there being 3 orgs with 103 training exemptions and the resultant competitive pressure. There should remain a 103 training exemption under a single org.

Comment NO: 1760	User Name: Goflyslow2

We need more letters like this from true aviation experts: CFI's / Commercial / IFR Pilots mikemarron912" Date: Sun Apr 28, 2002 2:02 pm Subject: My NPRM Comment Below is the comment I just submitted electronically to the FAA regarding the Sport Pilot NPRM: I am extremely grateful that the Sport Pilot NPRM presents many wonderful new opportunities such as: basic training leading to a more advanced pilot certifications, industry consensus aircraft certification standards enabling ultralight manufacturers to market ready-to-fly aircraft, and of course the driver's license medical -- the "crown jewel" of the entire proposal. Unfortunately, the ultralight community has not enthusiastically embraced the Sport Pilot and Light Sport Aircraft proposal and the fact deeply concerns me. As an EAA Ultralight Flight Instructor (UFI), FAA A&P mechanic, CFII, and single and multi-engine aircraft "single-pilot IFR" Commercial Pilot, I am convinced that certain aspects of the proposal must be changed, or deleted in their entirety, or else the Sport Pilot and Light Sport Aircraft program may actually end up destroying the magnificent sport of ultralight aviation! I am convinced that the NPRM is much too complex and needs to be greatly simplified in order to be successfully and enthusiastically supported by the ultralight community. The comment period for the Sport Pilot NPRM absolutely must be extended to allow more time to study this enormous document and all of its potentially devastating ramifications to the presently thriving ultralight community. In my view, below are just a few of the many changes that need to be made to the proposal: * Delete the "make and model" training and logbook endorsement and require only "category and class" training and endorsements. * Delete the requirement of "5 hours of pilot-in-command" time in each "make and model" in order to instruct in light-sport aircraft. * Delete the provision that restricts a student sport pilot from operating a light-sport aircraft that exceeds a cruise speed of 87 knots. * Delete the requirement that a weightshift aircraft instructor must receive spin training. * Delete the 10,000 foot altitude restriction. * Delete the requirement that an experimental aircraft equipped with an "engine-driven electrical system" must be equipped with a mode-C transponder in order to operate outside of controlled airspace under the so-called "mode-C veil." * Delete the stipulation in the NPRM which states that a sport pilot who is an aircraft salesperson may not demonstrate an aircraft in flight to a prospective buyer. * Amend FAR 61.31 to allow ultralight pilots to receive basic and advanced training that will expand their privileges to those enjoyed by pilots certificated under FAR Part 61. * Amend FAR 91.191 to allow an ultralight to receive an experimental airworthiness certificate without requiring that the ultralight aircraft be placed in the experimental-exhibition category, and without requiring the aircraft to be built under the "51-percent" (amateur-built) rule. * Amend FAR 21.191 to allow all experimental two-seat ultralights to be used for compensated flight instruction indefinitely. * Amend the Sport Pilot NPRM to allow sport pilots to tow hang gliders after training and a logbook endorsement. * Amend the Sport Pilot NPRM to allow night-flying privileges in a weightshift aircraft after flying a 50 nautical mile cross-country trip at night, not 100 nautical miles at night. * Amend the Sport Pilot NPRM to allow light-sport aircraft equipped with strobe lights to operate in early morning and late afternoon "twilight" hours. * Allow the sport pilot to obtain the privilege of operating in Class B, C, or D airspace after S/he receives additional instruction in each type of airspace. * Allow sport pilots to fly light-sport aircraft equipped with retractable gear, controllable pitch propeller, or two engines after receiving appropriate training and endorsements. * Provide sport pilot instructors with on-site examiner training courses, at FAA expense, without requiring sport pilot examiner candidates to travel to Oklahoma City. * Delay the implementation of the Sport Pilot NPRM until after a sufficient number of FAA Safety Inspectors are checked out in ultralights and qualify these safety inspectors as the first FAA Sport Pilot Examiners. In addition to the changes listed above, before we jump on the Sport Pilot/Light Sport Aircraft bandwagon, we simply need more time to study all applicable Sport Pilot/Light Sport Aircraft FAA written exams, practical test standards, advisory circulars, pilot textbooks, etc. Realistic costs and procedures used to implement the 16 and 80-hour maintenance schools, Designated Pilot and Airworthiness Examiners, liability insurance, industry consensus standards, etc. must also be carefully analyzed and/or revised before any permanent rules and regulations are adopted. In the meantime, the present ultralight two-seat training exemption should be made into a SFAR (Special Federal Aviation Regulation) and a new FAA certificate for ultralight pilots should be

created, that is issued by an FAA-recognized ultralight organization, and that allows an ultralight pilot to legally carry a passenger. Sincerely, Michael J. Marron Clearwater, FL 727-443-6951

Comment NO: 1761	**User Name: edburkhead**

I strongly agree with the proposal. It is, in my opinion, necessary to the United States' continued strength in world aviation. In the 23 years I've been in aviation, the number of General Aviation pilots and planes in the U.S. has been nearly static. At the beginning of that time, we made almost all of the aircraft of the world. Now, we don't. Now, a large part of the certificated planes sold in the U.S. are foreign made. Many of the INTERESTING new designs are foreign made. The light aircraft / ultralight aircraft boom overseas has done THEM a lot of good. In my club, the Ercoupe Owners Club, the average pilot age at the national convention is pushing toward 60. The youngest pilot has often been 30. This is true, even though our aircraft is one of the lowest cost and simplest to fly. This is true because the cost of operating a certificated plane and obtaining a Private Pilot License has been so high people I know never think it's even POSSIBLE for them to think about learning to fly. There is a huge need for these light-sport aircraft to be economical to design and operate. (I do think the light-sport aircraft rules ought to allow slightly heavier, safe to fly, certificated planes like my Ercoupe to be flown by Sport Pilots. The Ercoupe was designed from the ground up to be the kind of safe airplane that should be flown by Sport Pilots.) Using the drivers license as a medical criterion causes me little or no worry.

Comment NO: 1773	**User Name: A10DSS**

I generally agree with the Sport Pilot consept as proposed, though I feel some minor alterations are required to further streamline procedures and the compliance process.

Comment NO: 1775	**User Name: AmesJW**

I agree with the FAA proposal and support the EAA's proposed changes. I think that the proposal will provide a much needed boost to GA in the USA

Comment NO: 1777	**User Name: flylite447**

Agree. ONLY IF FAR 103 instruction is NOT included with Sport Pilot. Including FAR 103 instruction under Sport Pilot will reduce ultralight safety by destroying the unity and continuity of the ultralight community. Ultralight safety is promulgated by the ultralight community. Since formal instruction is very basic, ultralighters gain most of their aviation knowledge through their association and flights with more experienced ultralighters and instructors. It's especially essential that maintenance knowledge is transfered, since there is no other way to learn how to maintain an ultralight. The ultralight community is very safety oriented, and assists new and inexperienced ultralight pilots to fly ultralights safely. I started flying ultralights after obtaining my Private Pilot certificate. I would not be a safe ultralight pilot had I missed out on the mentoring and advice from experienced ultralighters.

Comment NO: 1780	**User Name: fnad**

Turn the current exemption for flight instruction for PPC's into part of SFAR 89. The govt is again trying to remove the responsibility for common sense from the common man. This is happening too fast. We're just getting the info and the deadline is here.

Comment NO: 1785	**User Name: houghdl**

I agree, but would like to see it extended to include at least aircraft in the 150/152 category if not the 172 category.

Comment NO: 1786	**User Name: Gscale**

I heartily agree with the proposed rules. They are a tbrowback to the post WW II days when it was felt that everyone could have a plane at a cost near that of a car. Within the rule the FAA should publish a definitive list of aircraft that can be flown by sport pilots. This could remove any confusion regarding AWCs for older airraft.

Comment NO: 1798	User Name: gldrboy

It is an excellent proposal, and I hope it will rejuvenate GA not concerned with business aviation. However, the weight limit is set too low. Aircraft such as C152, Ercoupe 415D, Piper Tomahawk, etc shoudl be included. They are at least as safe and easy to fly as a Kitfox Lite, or similar aircraft.

Comment NO: 1805	User Name: Hank Austin

I strongly disagree with the NRPM regarding powered parachutes. I prefer that the exemption process continue owing to the individualized needs of the PPCs. Lumping all UL/Light Sport aircraft into one catagory is not managable and not enforcable. As to the overall NRPM, I also suggest sticking with the current exemption system and INCREASING the allowable weight to 1232 pounds with specific pilot training stipulations. Enforcing Sport Pilot for light aircraft will be a nightmare. The FAA is empowered to foster and stimulate the growth of aviation. Sport Pilot will inhibit the growth of the PPC industry.

Comment NO: 1806	User Name: flyboyz21

I disagree with the NPRM concerning powered parachutes. They should be treated completely different as they are like no other aircraft out there. I think they should have there own catagory. The PPC industry is finally being recognized for its safety and unique way of flying, and I hope it remains that way. Sport pilot will shy away alot of people that would like to fly a ppc.

Comment NO: 1807	User Name: flyboyz21

Here is an approach that will move the Powered Parachute Industry in the right direction. The assumption is "that the very minimum of regulations and red tape is best." Create a grouping for all Powered Parachutes (II. Special, H. Powered Parachutes). The single place and two place Powered Parachutes should be in one group. The limits would need to be adjusted to fit both models of Powered Parachutes and not those of fixed wing aircraft. In this grouping the Powered Parachute could be certified as a Sports, Recreation and Utility or Commercial Use Aircraft. All Powered Parachute pilots need to be trained throughly. The training and regulations need to match the Powered Parachute and not include fixed wing requirements. The only exception would be where Powered Parachutes interacts with fixed wing aircraft. Example - Minium AGL in G airspace should not be the same as for fixed wing aircraft. An engine out situation is not the same for a Powered Parachute as it is for a fixed wing aircraft especially those that fly more than 35 MPH. The objective should be freedom to fly safely, with minium cost and red tape. For the engine and wing realistic care and maintenance recommendations should be setup Powered Parachute Industry wide and should replace certification. A Rotax engine and the various wings are not hard to maintain. The how of this should be covered as a part of Powered Parachute pilot training. The certified Rotax mechanic program is good but the technician should be protected from litigation. He or she should not be expected to know and catch everything. In the case of a disagreement Binding Arbitration should be used to settle it. Binding Arbitration should be used industry wide. All rules should be minimal and realistic. Those designed to cover someone's Butt should be eliminated. Is all this real and possible? Yes it is. I have found that many, if not most, people want to fly the Powered Parachute because of its safety record and ease to fly, along with the perceived freedom from unnecessary rules and regulations. Many wait for several years to gather the money to buy a Powered Parachute. Anything that we can do to keep the purchase, overhead and operation cost down will help the Industry grow long term. Most people that take an introductory training flight say "I'm going to buy a Powered Parachute as soon as I can afford and justify the purchase." To bring new people in, we need to maximize the advantages and appeal of the Powered Parachute. We do not have a safety problem. Better pilot training would help to further improve the safety. We also need to take the shackles off of owning a Powered Parachute. The technology has many applications that could be utilized if we were given the freedom that the rest of the aircraft industry enjoys. In the State of Washington there is a large clientele base in Agriculture if the Powered Parachute could legally be used on a commercial basis by farmers, ranchers and other land managers and their support businesses. Limits on

commercial use of the Powered Parachute should not be any different from other types of aircraft. Sports Pilot will get us out of the two place exception but will it move us toward the above? And what will happen to the older two place machines in three years, when the exception is phased out? If these aircraft are phased out so they cannot be flown legality, my guess is that most owners will quite flying, thus we all lose. This may help you understand where we should be going. The new Sports Pilot proposal is not headed our way. Respectfully Submitted, Keith Middleton Pasco, WA

Comment NO: 1808	**User Name: rjdaugh**

Good proposal. Will help aviation.

Comment NO: 1817	**User Name: DFE**

I think that Sport Pilot is a good idea, and for the most part the NPRM is decent. However, it has 3 fatal flaws. First, Sport Pilot isn't suppost to deal with FAR 103, but if Sport Pilot includes doing away with training for FAR 103, then it's back to the good old days of learning to fly yourself, and accidents, and deaths. Even though FAR 103 is being left alone, doing away with the exemption, which isn't part of FAR 103, is still going to have a major effect on FAR 103 learning to fly, and transitioning to different ultralight vehicles. The concept that in 3 years, or whenever, that there will be certificated Sport Planes for teaching prospective Ultralight Pilots is just plain defective. There are older designs which no longer have manufacturer support. Much is made of having training in 'make and model' in the Sport Pilot NPRM. What about training in make and model for FAR 103 Ultralights? Isn't the well being of these people as important as those participating in Sport Pilot? My suggestion would to have a mechinism to allow, when a certificated training Sport Pilot aircraft is not appropriate, an appropriate 'N' numbered Sport Pilot aircraft to be used for 'training for hire', should such exist. Second, without DPEs there can be no Sport Pilots. The FAA *MUST* have such available on day one of Sport Pilot. There will be an initial enthusium, and if Sport Pilot is to succeed, it must ride on this wave of enthusium. If the people currently flying 'illegal airplanes' convert immediately, many will never get around to doing so. One solution is to take any WILLING AFI from any of the current exemption programs, and groom them beforehand, or grandfather them in automatically for a short period, 6 months or so, and have them handle the initial surge of applicants. If they wish to continue after the introductory period, the FAA can decide what additional training and such would be required. Fail to do this, and Sport Pilot has a good chance of failing. The same issue is applicable for Sport Pilot Instructors. Have some ready on day one, even if not all will remain in the program. The key is to get people into the program. Finally, training in make and model. As with the rest of Sport Pilot, make things hard to impossible and pilots will continue to fly outside all programs and regulations.

Comment NO: 1821	**User Name: EdM**

The proposal will provide much needed accessability to aviation at more reasonable costs and with a safety factor commeasurate with the targeted flying activity. I have my doubts that the insurance industry will be able to keep up with these developments.

Comment NO: 1822	**User Name: megamouse**

Great general concept, but far to complicated. Wording needs to be clarified in more understandable terms. Regulations that are not readily understood will not be closely followed, and it is unreasonable to expect people is sport catagory be up to the task. Also invites people to be taken advantage of by persons misrepresented what is permitted by the regualations. PLEASE REWRITE IN SIMPLE CLEAR LANGAGE.

Comment NO: 1831	**User Name: kpcp**

Written comments mailed May 4, 2002.

Question Number 2 - Please comment on the FAA's assessment of potential safety benefits that the proposed rule would generate, considering the number of light aircraft accidents contained in the NTSB's historical record for primarily U.S.-registered aircraft. This can be found in Section IX - Analysis of Benefits. Do you believe that most accidents over the past 10 years involving non-U.S.-registered light-sport aircraft were reported to the NTSB?

(2) Please comment on the FAA's assessment of potential safety benefits that the proposed rule would generate, considering the number of light aircraft accidents contained in the NTSB's historical record for primarily U.S.-registered aircraft. This can be found in Section IX - Analysis of Benefits. Do you believe that most accidents over the past 10 years involving non-U.S.-registered light-sport aircraft were reported to the NTSB?

Visited: 429	Total Comments: 111	Last Post: 5/6/02

Comment NO: 10 **User Name: Comperini**

The question is hard to understand, but if you are implying the question "does NTSB records accurately reflect ultralight accidents", I would say it does not, since there is no requirement that Ultralight accidents under Part 103 be investigated by the NTSB. The assumption that "any crash involving a plane that has no registration" is to be considered an "ultralight" crash, is wrong. If a plane is not Part 103 compliant, or is not being operated within the boundaries of the ultralight training exemptions, then the airplane is an (illegal) "unregistered airplane". Because of this, I question how many of these crashes were from "ultralights" operating legally.

Comment NO: 19 **User Name: clelandr**

Were not reported

Comment NO: 21 **User Name: delta2ul**

Many incidents and accidents in non-registered vehiclas have not been reported in the past, both because they were not required to be reported and local officials were unwilling to investigate "ultralight" accidents. As a result, both the raw acident data and the number of hours of service are unavailable. I believe that if they were available, they would indicate a very good record, due primarily to the training pilots recieve in emergency procedures, the subsequent awareness of pilots to the potential of a forced landing, the fact that pilots practice engine out landings, and that the nature of the aircraft make successful off field landings highly possible.

Comment NO: 27 **User Name: DartHere**

The way the FAA has presented the numbers in 5397 of the NPRM, they either believe that there will be only one death in these types of aircraft for the next ten years, or they have no idea how many deaths there will be, but believe there will be 82 less than there would have been. How can anyone expect the first or verify the second? An argument could just as easily be made that by allowing people to fly who otherwise couldn't qualify for a medical, and by encouraging "N" numbered ULs to use airports normally used exclusively by general aviation aircraft, there would be an increase in the number of deaths not a decrease. Based on the reported deaths over the last six years, the FAA shows a projected 10-year count of 83 Deaths, most of which would come from the "fat UL or two-place trainers". If this proposed rule has a potential of saving 82 lives over the same period, how many lives is the FAA projecting will not be saved over the same period? How did the FAA arrive at these numbers? If the FAA is projecting an increase in the number of aircraft in the Sport Pilot program, over the combined number of current Pilots in the Ultralight and Rec Pilot programs. What is this projection based on? Where will the largest portion of the new pilots come from? If it is Ultralight Pilots, will this change the number of projected Deaths, and will that change the "cost saving" projection? If it is from Rec and Other Pilots will this change

the number of projected Deaths and will that change the "cost saving" projection? As for the question regarding the reporting of the accidents to the NTSB, I find this to be a self-serving question. As the FAA already knows the FAA and NTSB ignore accidents involving Ultralights. But because of the small size of the Ultralight community, and the availability of the Internet, I believe that most, if not ALL deaths are reported to one of the several ORGs that administer the Ultralight programs.

Comment NO: 41	User Name: capella1

We believe there have been accidents involving unregistered aircraft that may fit within the proposed Light Sport Aircraft category that have not been investigated by the NTSB. Since the NTSB does not investigate Ultralight accidents, and these aircraft carry no US registration, we do not beleive that there is any reliable accident data available for these types.

Comment NO: 42	User Name: capella1

We believe there have been accidents involving unregistered aircraft that may fit within the proposed Light Sport Aircraft category that have not been investigated by the NTSB. Since the NTSB does not investigate Ultralight accidents, and these aircraft carry no US registration, we do not beleive that there is any reliable accident data available for these types.

Comment NO: 49	User Name: RDavis

As others have commented, it has not been required to report ultralight accidents to the NTSB. Therefore, any estimates of improved safety under the NPRM are done with incomplete data and are speculative in nature.

Comment NO: 56	User Name: cbranagh

I believe most accidents were reported.

Comment NO: 78	User Name: Bradley

I don't believe the new proposal would do anything tangible to increase safety. I don't know about reporting of accidents.

Comment NO: 108	User Name: Bill Cartwright

Absolutely NOT! There has been little if any documentated kills or casualities listed compared to the number in actual. I estimate in the UL arena there are approximately 3 to 4 hundred per year that require medical attention with 125 a year that require funeral arrangements. The deaths are not always with inexperience pilots as several Manufacture reps and owners themselves with thousands of GA hours and hundreds in UL have also died. Taking a blind eye has protected the FAA so far but as soon as Sport Pilot is mandated, the N number , the FAA will require a massive support group to investigate the hundreds of accidents every week. I do hope your budget can support this. Are you aware I can take a Sport Pilot plane and land at LAX or SFO under this rule? It would have been better to make 3 changes in Part-103 than reinvent the wheel which is what is taking place.

Comment NO: 117	User Name: w1bfn

No Comment

Comment NO: 149	User Name: daberti

I don't believe that there are a significant number of unreported, non-U.S.-registered, light-sport aircraft accidents.

Comment NO: 152	User Name: barnesrc

This proposed rule making will improve the safety of general flying. Many "illegal" pilots (expired medical or expired biannual)currently don't fly enough to be proficient at what they do. There is always that nagging "What if I get inspected" fear in the back of their mind. The proposed rule making eliminates the two biggest recurring hurdles to keeping pilots legal to fly and thus will keeping pilots flying more often and thus being more proficient.

Comment NO: 169	User Name: Ultraliteteacher

There are few if any safety benefits that come to mind. I'd bet my life (I do each time I fly) that fewer than 5% of the accidents would have been averted even if there was 100% compliance with the NPRM. The NTSB has 42 accidents for 'ultralight' aircraft for the last 12 years. Of these, about 1/2 were NOT part 103 craft, as they had N numbers. There were 10 fatalities in 12 years on the NTSB database for part 103 craft. I do not believe that the NTSB has been informed of all of the accidents. Nor do I believe that the addition of this NPRM will significantly change that.

Comment NO: 194	User Name: sthomason

No. The non-regulation inherent in part 103 allows non-reporting, and I doubt seriously that most pilots would report it if they were flying and illegal aircraft, which I'm sure happens quite often.

Comment NO: 207	User Name: Batson

I believe that most accidents have been reported. Usually it is to the local police. They may or may not contact the FAA. However, under the Sport Pilot Proposal, all but the ultralight strictly under 103 would be required to report accidents. This could only have a positive effect on ADs (or whatever they will be called) and training for the new class of pilots/planes.

Comment NO: 263	User Name: dalemseitzer

I believe the serious accidents were reported but I believe the FAA is over estimating the number of lives that will be save with this new proposal. The only way to save that many lives is to keep the planes on the ground. The least safe pilot is the high time GA pilot who thinks they can fly an ultralight with out some transition training. The second most dangerous pilot is the person who wants to fly an ultralight with no training.

Comment NO: 281	User Name: Q

The safety of ultralight pilots will be compromized because training will be more difficult and expensive to obtain. The safest way to handle this would be to write the training exemptions into part 103 instead of getting rid of them. I believe most ultralight accidents are not reported to the FAA simply because most are minor and cause no damage or injury.

Comment NO: 295	User Name: deeph2o

I think the risk is higher than can be estimated when you are dealing with an unknown number of pilots with half the experience of the typical new pilot taking the air.

Comment NO: 310	User Name: garyo

I believe any accident will be reported to the authorities who will then contact those concerned with the type of accident. The problem as I see it stems from the appropiate identification of the craft. Was it in fact an ultralight, experimental, registered, airworthy, etc. I feel many experimental craft have been refered to ultralights because of the nature of craft. However true ultralights I feel have been well documented in Canada for referance to saftey and reporting puposes. For a self regulated industry such as the Part 103 groups have overseen I think the results speak for themselves, given an eager public and press to prove otherwise.

Comment NO: 330	User Name: Joe G

If "non-US-registered light-sport aircraft" includes ultralights this is an unfair question. For the past 20 years FAA has refused to take reports and investigate ultralight accidents that did not result in property damage or bodily injury to other than the pilot. How could NTSB have any idea about these accidents?

Comment NO: 339	User Name: Goflyslow2

FAA has inadequate data base and flawed estimates.

Comment NO: 348	User Name: whiteman

Nobody that is flying an illegal aircraft and wrecks it is going to the NTSB and plead for mercy.....I think that the estimates are low, and more is the reason to bring this activity under the FARs.

Comment NO: 349	User Name: whiteman

Nobody that is flying an illegal aircraft and wrecks it is going to the NTSB and plead for mercy.....I think that the estimates are low, and more is the reason to bring this activity under the FARs.

Comment NO: 376	User Name: wjwil

I soloed with about 10 hrs of dual instruction.After flying several hrs.solo we continued my instruction doing more complex maneuvers,my first accel. stall in a turn I put the plane in a tight spin.This is my point a plane is a plane,sport pilots need the same training as a private.That day without my instructor I would have spun to the ground because I didn't know what was happening.

Comment NO: 385	User Name: bobkat

Probably most serious accidents involving unregistered aircraft were reported to some authority or the other. Many minor "incidents" probably are not reported, assuming nobody hurt of no property damage, etc We need accurate data regarding this, and we just don't have it.

Comment NO: 390	User Name: jwalters

The information is out there. It is reported but not always to the faa. For instance, the vast majority of x-planes are insured. any accident that requires a payout is reported. Now for the others that do not have insurance, when they do have an accident,almost certainly it does not happen out in the middle of nowhere, where no one is in observance. Whenever some property is damaged or destroyed some insurance somewhere whether property, auto , or what, will make a payout. It is the damage to ones property (ground based) that does not get reported,but may still make the news. Being in the Coast Guard I have seen it all.

Comment NO: 396	User Name: johnclay

No Comment

Comment NO: 418	User Name: ch900

As stated in part IX, Ultralight accidents are not fully represented in the NTSB statistics. The FAA appropriately contacted the UL organizations over the past 6 years for fatality information. I assume that these statistics under report the total fatalities, but it is a move in the right direction. (One could also sample online newspaper archives in population centers near high UL activity searching for articles about accidents.) One should not assume that 100% of the accidents targeted (per IX those where better training or safety standards could have prevented the accident) will be removed. But certainly some safety improvement will occur. To assume a certain improvement also assumes a rate at which fat UL and other non-registered sport aircraft will transition into legal aircraft status which may be lower than desired. The proposal will also, in my opinion, benefit safety per flight hour through the increased flying frequency (hense proficency) that will occur.

Comment NO: 431	User Name: hawkul

Since the US doesn't keep records on ultralights, the Canadian statistics would be more accurate. The potential lives saved were probably not calculated correctly. I would be interested in seeing the calculations in detail. I do agree that ultralights have a good safety record.

Comment NO: 447	User Name: hawkdrvr

I believe that registered aircraft have a lower reporting rate than ultralights

Comment NO: 457	User Name: ch900

A follow-up: I went to the online information base Newsbank, a collection of full text newspapers. I search in 69 papers from 32 states for the past 12 months. I searched on the word "ultralight" and "crash" in the same article. The results: 13 fatalities were reported. 10 injuries were reported. Some of the fatalities stated they were reported to the FAA or NTSB. ... so per my prior comment ... this gives another gauge level.

Comment NO: 471	User Name: William G. macIntyre

Have no data to support an answer regarding non-US aircraft.

Comment NO: 530	User Name: steve.stefanic

I agree that you will register more aircraft with the FAA. The true ultralight being a "vehicle" need only report to local authorities. The "Fat Ultralights" would not want to report to the NTSB. They might not even report to local authorities if they could get away with it. I think that registering the light sport "aircraft" will improve accident reporting to the NTSB

Comment NO: 538	User Name: 584241

No Comment

Comment NO: 564	User Name: stewart

I see no reason for non-U.S. registered light sport aircraft accidents to be reported to the NTSB. I also do not believe that all accidents in the U.S. are reported to the NTSB either.

Comment NO: 577	User Name: Taylorcraft078

No Comment

Comment NO: 609	User Name: cec1155

I think that this proposal would give the necessary level of regulation and training plus provide a much lower cost to create a true "sport" aviation segment in general aviation.

Comment NO: 621	User Name: greywing

I believe that many accidents were not reported. This proposal will enhance safety and possibly create AWD's that might otherwise go un-noticed.

Comment NO: 642	User Name: towpilot

I believe that the FAA's assessment of the potential safety benefits of the proposed rule are understated, if anything. Many non-fatal accidents involving ultralights, fat or otherwise, go unreported except to friends who help haul the wreckage away. I think the minds that devised this rule already know this and the safety benefits will be greater than expected.

Comment NO: 649	User Name: Triplek45

There will be no safety benefit when you take away instructor training for a complete class of aircraft aka; Ultralight. You can't put a new student in a 150 mph aircraft and teach him to safely fly a 50mph ultralight.

Comment NO: 665	User Name: aeromac

I think that many accidents were not reported. With Sport Pilot the FAA & NTSB will have much more accurate info.

Comment NO: 667	User Name: goluscombe

I believe that safety is one of the hallmarks of this proposal. Suitable training combined with sensible regulation appears to address this issue. I could not comment on the accident reporting to NTSB.

Comment NO: 673	User Name: Flyguy958

Any time you provide training safety will increase. This proposal will provide training to pilots who now have no way of getting any instruction.

Comment NO: 704	User Name: WJWHST

No Comment

Comment NO: 706	User Name: Steve

I feel that safety will be enhanced from the training required of 103 pilots moveing up as well as the training current pilots will get to get started again in the hobby they were forced out of years ago because of the cost

Comment NO: 720	User Name: Wayne McIntosh

By reading the NTSB reports I am sure that ultralight accidents were not reported to NTSB. Most ultralight accidents were reported to local police and I have heard from our local police that the FAA did nit want to hear about it. In my local area there have been more fatal GA accidents than there have been in ultralights. It may be due to the slow nature of ultralights or it may be that more hours are flown in GA aircraft than ultralights.

Comment NO: 725	User Name: FlyDiver

Most UL accidents are probably not reported. However, the ones causing death or serious injury are useually reported in the media and the totals do not appear to be grossly different than GA. That may well be more attributable to the slow speeds of ULs than anything else. In any event, as both a UL BFI and GA PPL, I think SP, with minor changes, can be a vehicle for improving training in light sport aircraft.

Comment NO: 747	User Name: bobgilpatrick

No Comment

Comment NO: 756	User Name: mccoy3

Maybe most have been reported but many have not.

Comment NO: 777	User Name: Steve

I firmly belive that safety will improve. The propasal will bring in many of the people already out there flying and give them a chance to be legitimate. The training required will be a more affordable way to participate in GA. I belive the accidents reported nay not be too accurate. However the training required for sp can only enhance safty.

Comment NO: 788	User Name: airgus

I don't think minor accidents in UL aircraft get reported. I do see a chance for better and broader training in the SP proposal, eventually creating a better official and inofficial safety record.

Comment NO: 818	User Name: jkenney

Small aircraft on the average are 30+ years old. The instrumentation is even older (50+). Additionally, many of the private pilots are older and have been trained in "seat of the pants" flying. All of these factors contribute to a poor safety record. With renewed interest in Sport Flying and the training rules for sport flyers along with NEW light-sport aircraft, the safety records should improve. Additionally, light-sport aircraft are targeted for short-distance fair-weather VFR flying which should also promote a good safety record.

Comment NO: 819	User Name: jkenney

Small aircraft on the average are 30+ years old. The instrumentation is even older (50+). Additionally, many of the private pilots are older and have been trained in "seat of the pants" flying. All of these factors contribute to a poor safety record. With renewed interest in Sport Flying and the training rules for sport flyers along with NEW light-sport aircraft, the safety records should improve. Additionally, light-sport aircraft are targeted for short-distance fair-weather VFR flying which should also promote a good safety record.

Comment NO: 826	User Name: gkrug

Logically, only those accidents that resulted in serious injury, occurred at tower controlled airports or involved the public would be reported. The threat of enforcement and embarassment would be reasons for not reporting. Many of these accidents are probably minor in nature. Safety is an individual responsibility that can be impacted through training, peer pressure and assistance. Quality aircraft and instruction are cornerstones. The EAA has been a positive factor in todays attitude towards safety. The proposal requires training which should address many of the exposures.

Comment NO: 841	User Name: Daveqw

Hangglider hybrids (hanglider ultralites) are inherently safe where should the engine fail it simply glides to a safe landing. It should not be held to the same standards as non-hangglider planes.

Comment NO: 857	User Name: frjn33

Since FAA specifically stated that ultralight aircraft accidents would not be investigated, of course they haven't all been reported, except, as noted, the ones which cause death or are in some way "newsworthy." Ultralight accidents are often nothing more than a bent tube or two, not significant enough to warrant the time, effort and expense of doing a full FAA investigation on something that in the automobile world would be called a "fender bender." Is FAA looking for more work?

Comment NO: 862	User Name: johnckircher

Given my experience with other forms of regulation and their impact on safty, I suspect that implimentation of these regs will actually reduce safty from current levels of personal responsibility and industry reputation currently being enjoyed by the general public. If the FAA wanted to offer a meaningful improvment to public safty, I would suggest a checklist of regularily updated standards for the buyer/operator to consult when purchasing goods or services, and an easily accessed internet registry of FAA investigated complaints regarding manufacturers and service providers for this class of aircraft, so that the buyer/operator could have a reliable current reference for his purchase/maintanence/operation. I think that personal responsibility and reliable information will be much more valuable and effective to the purchaser/operator and for the safty of the general public than any regulation that the FAA could propose.

Comment NO: 891	User Name: Spdrflyr

You folks are clueless. I've heard things that would turn you white. Many accidents are "cleaned up fast". Nobody wants to have the FAA, police or insurance in their nickers. I'm not a snitch...but boy! would you be surprised!

Comment NO: 913	User Name: Gator

No Comment

Comment NO: 956	User Name: dfreeman

The NPRM states in section IV that all the accidents are not reported to or recorded by the NTSB. I do believe however that the three exemption holders have documented all occurrences of related accidents. I think that the fact that the NTSB has not maintained historical records for this category is irrelevant. As for the potential safety benefits of the proposed rule, I think that by assuming that regulating and policing the fat ultra-lights will prevent 100% of the “calculated” number of training accidents is a real stretch of the imagination. I have not seen any comparison numbers for accidents related to primary or standard category training accidents and more importantly, total flight times, but they are currently highly regulated and policed and there are still accidents. I am in favor of this ruling by and large, but would hate to see the proposal be self extirpating by initial over-regulation of the proposed category.

Comment NO: 991	User Name: rotter

No Comment

Comment NO: 1000	User Name: johnhenderson

No Comment

Comment NO: 1016	User Name: Harold E. Thomas

Actually I am not up to speed on this subject and must decline comment.

Comment NO: 1026	User Name: Robert

I don't Think Safety will be a Problem with Sport Pilot.However the removal of Ultralight Instructor Exemption could be a problem for Part 103 Future Pilots.I suspect most "MINOR" ultralight accidents are not Reported.

Comment NO: 1041	User Name: RFI

Not enough information to make a valid judgement.

Comment NO: 1051	User Name: terryo

I know of several accidents, (none with injuries) that were not investigated/reported the LSP catagory will tighten up the "heavy ultralight" cowboys.

Comment NO: 1077	User Name: Gyroman

While I may not fully understand all of th ramifications of this proposal --I feel that safety would in no way be compromised-- Whether or not all of the accidents of non registered aircraft were reported to the NTSB is difficult to determine -but it seem to me that human nature being what it is --if it didnt have to be reported it wouldnt be!!

Comment NO: 1090	User Name: Flymo

Very hard to tell. Insufficient data.

Comment NO: 1100	User Name: fatplane

Most, if not all, of the non-registered aircraft accidents were not reported to the NTSB, primarily for two reasons: (1) When the accidents were serious enough to cause the police to request the FAA come out to the accident site, once they (FAA) viewed the wreckage and injury, the typical response was "Oh, no 'N' number, its an ultralight. You don't need us; or, if the accident was not serious the police were not called and the owner/builder/pilot hauled the aircraft back to his shop and repaired it himself. The FAA is not going to improve upon an already incredibly great safety record by adding more hoops to jump through. Why do you value a life as worth $2.7 million? Why not $500,000? When I was a young, married aero engineer, the company I worked for insured my life for $250,000. If you add inflation, it should be about $500,000 now.

Comment NO: 1130	User Name: 21214

The current reporting system is fine. FAA guys don't normally really even care about non N numbered aircraft. They leave it to local authorities

Comment NO: 1135	User Name: rotopup

I believe "serious" accidents have been reported.

Comment NO: 1168	User Name: jonvee

I believe safety will only be enhanced if proper training is available at a reasonable cost and is near the new the pilot. I believe many small accidents are never reported.

Comment NO: 1175	User Name: heronium

No Comment

Comment NO: 1179	User Name: Bob L

For the Gyro community, this regulation as it is written will lead to a decrease in safety. We have worked for ten years to up grade training so people won't sustain the high accident rate that was a part of the old self training programs. Gyroplanes need to have either the exemption continued or letters of deviation for instruction. If instruction is not available, we will revert to the old method that cost us several lives.

Comment NO: 1211	User Name: PWPlack

No Comment

Comment NO: 1218	User Name: helitim

I believe a very large number of accidents have gone unreported based on conversations I have heard at airshows and read on different websites. The NPRM as advertised will encourage many potential aviators to receive flight training that may not have been willing to pay the high costs previously. However, the ultralight and gyroplane community will potentially suffer significant setbacks to formalized training if the requirement to utilize a certificated aircraft for training is mandated. Many of the available training aircraft cannot be cetified or can only be certified at extensive cost to the instructors. Many of these instructors simply cannnot afford additional encumbrances and will not be able to continue training an already limited segment of aviation.

Comment NO: 1224	User Name: SPAANS

Get a life. Isn't this the same stats. that were used to promote the failed REC. PILOT CERTIFICATE.

Comment NO: 1247	User Name: pokey1652

The safety benefits will come from manufacturing standards an the potential for more instructors in this new grassroots are of aviation. It is currently not that easy to find instructors for flying these types of aircraft. Creation of a new market for instruction amke alleviate this and result in better trained pilots.

Comment NO: 1254	User Name: Dugaru

No Comment

Comment NO: 1262	User Name: skiptyler

No Comment

Comment NO: 1269	User Name: James48843

I am aware of at least three fatal accidents in the past 24 months in Michigan, which do not show up in NTSB data. It appears there are at least an equla number of non-reported fatal accidents as reported fatal accidents in NTSB data. NTSB data does not contain all accidents because non-registered "potentially ultralight" accidents are routinely classified as ultralight vehicles without further investigation, and not reported.

Comment NO: 1311	User Name: lsippell

No Comment

Comment NO: 1323	User Name: MikeCleaver

The Australian experience is that requiring training for ultralight pilots (especially those with high momentum aircraft experience) has been a life saver. over 15 years we have issued 15000 pilot certificates for ultralight aeroplanes, of which about 3500 remain current - and have several gyroplane, glider, hang glider, trike and balloon pilots as well. Sensible administration by national user groups has reduced the ultralight accident rate significantly because of proven design and certification standards.

Comment NO: 1328	User Name: RTHOMPSON

I feel this would only help safety, through better aircraft and better training and more opertunity for the aviation community to share safety issues. I feel light GA avation has been safe, with most acidents reported in the past.

Comment NO: 1346	User Name: GeraldEmery

I think that most responsible pilots have reported any accidents that fall into the appropriate catagories.

Comment NO: 1357	User Name: knight starr

i believe at least 50% of actual incidents went unreported. After a forced landing on a local freeway, pilots came out of the woodwork and confessed their unreported incidents.

Comment NO: 1382	User Name: wolfsdens

No Comment

Comment NO: 1406	User Name: humair14

I doubt that most accidents over the past ten years involving non-U.S. registered light-sport aircraft were reported to the NTSB.

Comment NO: 1417	User Name: RichJennings

The reporting, (or more acturately), the NON-reporting of Ultralight and non-registed light sport aircraft accidents, can be layed at the feet of the FAA. It was the FAA's decision that accidents involving ULs NOT be handled by FAA. Since the FAA considered ULs as "vehicles" and not aircraft, they allowed themselves to be detachted from involvment in such accidents, and thus have no "track record" of truely accurate accident rates. All that said, I still think the safety record of ULs is a good one. It's just that without proper record keeping, there is no firm way of proving that statement. The USAU, ASC, and EAA try to relate accident histories in their publications but they only have information to work with, from REPORTED accidents to them. Ultralight pilots can't learn much from UNreported accidents.

Comment NO: 1424	User Name: biz451

I do not believe that most PPC (powered parawing) accidents are reported, due to fear of punishment. Increased regulation will not alleviate this problem, but innovative voluntary solutions (such as anonymous incident reporting) might.

Comment NO: 1447	User Name: sleepy

This is hard to say. I do believe that there are a high number of minor GA accidents that aren't reported. I suspect it is the same with ultralights. I don't see that any rule change will make a significant difference.

Comment NO: 1452	User Name: Marschner

I don't believe reporting was required therefore it was not done. I also disagree with the comment the new regulation will potentially save 82 lives. Safety is in the education of the pilots and the appropriate application of aviation knowledge by the pilots. Most accidents involve some infraction of the regulations. Once that is determined then the regulations are generally used against the pilot or his family for the collection of damages.

Comment NO: 1457	User Name: llhoedl

Yes I believe the accidents were reported to the NTSB.

Comment NO: 1458	User Name: llhoedl

Yes I believe the accidents were reported to the NTSB.

Comment NO: 1516	User Name: bjmoore

The FAA's assessment is at best a guess. The FAA ignores data from canadian ultralight aviation

which will be very similar to the requirements of Sport Pilot. Canadian ultralight owners are by regulation wholly responsibile for the maintenance and airworthiness of their aircraft. Canadian ULs have less fatal accidents per registered UL, than their registered GA counterparts. The FAA cannot forecast what participation in this rule will be. There are so many GA contingents that want more weight and speeed added to the rule that with its limitations, participation in the rule may be low from that arena. Additionally, the rule is so onerous to FAT UL pilots that many of them may decide not to participate. The esoteric facts make it impossible to forecast rule participation and the safety benefits that will be resultant. Finally, the rule actually has the potential to increase accident frequency and fatalaties, due to the certification requirements that may be required for the "special" LS aircraft.

Comment NO: 1537	**User Name: Bill Bardin**

The FAA assessment is based on false numbers as relating to ultralights/ultralight trainers. Therefore, the entire analysis is faulty, causing the conclusions to be faulty. By checking NTSB records, one can realize that the majority of the accidents were illegal operations. Therefore, the statistics point to a failure by the FAA to enforce current regulations, not a need to create more. There were no non-US-registered light-sport aircraft in existence, therefore no accidents were reported. If you are referring to ultralights, most were not reported because they are not required to, being recreational vehicles. Many illegal operations that create accidents are not reported for obvious reasons.

Comment NO: 1562	**User Name: ultraj51**

I think most accidents of light a/c have not been reported because pilots dont see most of them as a problem ie bent front landing gear $35 not 3500 like a cessna

Comment NO: 1563	**User Name: bliddel**

As worded, the question is invalid. What would I be agreeing with? I hgave no way to know what percentage of applicable aircraft accidetns were or were not reported. If I did have such means, then the FAA would also have such emans. If I knew absolutely, would I agree or would I disagree? Only my comments may be useful here. Clear and reasonable regulations will always generate better public involvment and participation in public endeavors (such as public safety) than will legaleze mumbo-jumbo that is overly burdonesome and poorly publicized. This NPRM will improve saftey in fat-ultralight operations because it will cover an existing and worthwhile segment of aviation that has been ignored far too long. The degfree of success will be determined by the clarity of the regulation, and by the manner of enforcement. A friendly FAA is a far safer one than the "gotta make my quota of pilot bustings" mentalilty of someone in enforement who enjoys spreading misery but cares not one bit for sanity or saftey or rational thinking. Consider the phenominal success of the Wings Aviation Saftey Program. Time and time again we are told by the FAA that we (the voluntary participants) are NOT the ones having the accidents!

Comment NO: 1590	**User Name: harveyking**

I don' believe anyone can know how many accidents were reported since the NTSB has elected not investigate. I don't believe there will be a change in the acual accident rate with U/L type aircraft as most accidents are pilot error or unfortunate circumstances. There is not any real benifit to compiling statisics just to have them.

Comment NO: 1597	**User Name: davidbauch**

No Comment

Comment NO: 1617	User Name: JSTO1

The potential for accidents will be decreased and the individuals obtain additional training in the care and maintenance of their aircraft. This education will reduce the incidence of accidents caused by equipment failure. Accidents are under reported in my opinion. Changing the impact of submitting a report is the way to get people to participate. Modify the NASA Safety reporting system for incidents of airspace and operations to include maintenance and non-fatal accidents with the same immunity features would change the balance in favor to making a report. All fatal accidents need some level of reporting and analysis for probable cause. The tort system as it currently operates is a significant obstruction to improved safety. I fails to correct problems while rewarding attorneys. The data presented is of questional integrity but at least provides a basis for dialog. If it helps get this NPRM enacted it is worth the effort.

Comment NO: 1629	User Name: live2av8

YES, though I have to question why you posted false information within IX. Within section IX you write: “The FAA began gathering data on part 103 training accidents and incidents in 1995 when it issued the first exemption from part 103 for training.” You may have begun gathering data in 1995, but regarding exemptions, how could you be so wrong in posting incorrect information? Exemptions were issued w a a y back in the early 80’s. And throughout past decades USUA has produced the most well trained INSTRUCTORS, yet you appear determined to ignore the facts. -live2av8-

Comment NO: 1645	User Name: gyrochuck

I agree that most non-registered aircraft accidents are not reported to the NTSB. I believe with the Sport Pilot rule, along with mandatory accident reporting, would lead to better safety. The more accidents are reported the better the accident analysis would become. This would lead to better safety suggestions and point out safety issues for a particular aircraft.

Comment NO: 1668	User Name: kerrylamb

Accident analysis is obviously a function of reporting. I believe that a Sport Pilot/Light Aircraft rule would enhance the likelyhood of notification to the NTSB. Further it would encourage the training that helps hold down the number of accidents.

Comment NO: 1677	User Name: john brady

I think it's been a gray area with the 2 place ultralite for training purposes, as far as it's legal use and the training and use of these ultralite, I think once the exemption is over or run out, we would see a great improvement in the safety record. People will no longer be able to fly this type of aricraft just to say we are instructing or training a person to fly in an ultralite. The aircraft would come under the LSA Cat and would have to have a Sport license to fly the aircraft and therefore would demonstrate his/her ability to pilot such an aircraft. Also would have to get training thru some type of ground school.

Comment NO: 1709	User Name: Goflyslow2

If it looks like an Ultralight, it must be dangerous.. From CNN Sports Illustrated April 20, 2002 TALLADEGA, Ala. (AP) -- Jack Roush, the NASCAR owner who fields four Winston Cup cars, remained hospitalized in critical but stable condition Saturday, one day after the ultra-light plane he was piloting crashed in south Alabama. The plane, a twin engine Air Cam, used by the National Geographic Society to take pictures, according to Smith, went down in a residential area at about 6 p.m. No passengers were with Roush.
http://sportsillustrated.cnn.com/motorsports/nascar_plus/news/2002/04/20/roush_day2_ap/
Actually, the aircraft was N912S and the famous Race car owner is a certificated pilot but apparently without current medical as he does not show up in the Data Bases N-number : N912SAircraft Serial Number : AC-008Aircraft Manufacturer : LETT R/CAMPBELL KModel : AIRCAMEngine Manufacturer : BOMBADIERModel : ROTAX (ALL)Aircraft Year : 1999Owner Name : PIKE AVIATION INCOwner Address : PO BOX 707TROY, AL, 36081-0707Registration Date : 28-Dec-1999Airworthiness Certificate Type : ExperimentalApproved Operations : Amateur

Built

Comment NO: 1717	**User Name: Goflyslow2**

Study Of Aircraft Accidents In Canada From 1987 To 1996 The general perception is that ultralight activity is far more dangerous than general aviation activity. The purpose of this study is to analyze factual accident data that is available for both ultralight and general aviation aircraft in order to objectively quantify the safety records of the two categories. There is no reliable source for the number of hours flown each year so the metric used is accidents per registered aircraft. This avoids the criticism that there are aircraft on the registry from both categories that are not being flown and affords an apples-to-apples comparison. Accidents per Aircraft Registered - Ultralight and General Aviation The table below shows total accident rates for both categories of aircraft. Ultralight Accidents Ultralights registered Ratio - Number of registered ultralights per accident Accident Rate per ultralight registered General Aviation accidents General Aviation Aircraft registered Ratio - Number of GA aircraft registered per accident Accident Rate per GA aircraft registered 1987 42 2949 1:70 0.014 472 22,270 1:47 0.021 1988 29 3105 1:107 0.009 497 22,469 1:45 0.022 1989 37 3211 1:86 0.012 482 22,463 1:47 0.021 1990 36 3363 1:93 0.011 498 22,278 1:45 0.022 1991 39 3477 1:89 0.011 453 21,973 1:49 0.021 1992 41 3607 1:88 0.011 435 21,795 1:50 0.020 1993 50 3744 1:75 0.013 422 21,452 1:51 0.020 1994 36 3840 1:107 0.009 380 21,212 1:56 0.018 1995 44 3956 1:90 0.011 390 21,169 1:54 0.018 1996 28 4070 1:145 0.007 335 21,089 1:63 0.016 Average 38.2 1:95 0.011 364.4 1:51 0.020 Accident data from the Transportation Safety Board of Canada Registration data from Transport Canada Safety and Security In 1987, there was one accident for every 70 ultralights flying which gives an accident rate of 0.014. In 1996 there was one accident for every 145 ultralights flying which yields an accident rate of 0.007. Compare that to the figures for general aviation where in 1987 there was one accident per 47 aeroplanes, an accident rate of 0.021, and in 1996 there was one accident for every 63 aeroplanes flying, an accident rate of 0.016. In the ten years covered by this data, the accident rate for ultralight aeroplanes is lower than for general aviation, in many years by half. Fatal Accidents per Aircraft Registered - Ultralight and General Aviation There is the possibility of unreported accidents for both ultralight and general aviation aircraft. To eliminate this a comparison was made of fatal accidents since fatalities are always reported. Fatal Ultralight Accidents Ultralights registered Ratio - Number of registered ultralights per fatal accident Fatal Accident Rate per ultralight registered Fatal General Aviation Accidents General Aviation Aircraft registered Ratio - Number of registered GA aircraft per fatal accident Fatal Accident Rate per GA aircraft registered 1987 3 2949 1:983 0.0010 55 22,270 1:404 0.0025 1988 6 3105 1:518 0.0019 50 22,469 1:449 0.0022 1989 4 3211 1:802 0.0012 60 22,463 1:374 0.0027 1990 6 3363 1:561 0.0018 47 22,278 1:474 0.0021 1991 7 3477 1:497 0.0020 64 21,973 1:468 0.0029 1992 5 3607 1:721 0.0014 47 21,795 1:464 0.0021 1993 3 3744 1:1248 0.0005 48 21,452 1:447 0.0022 1994 8 3840 1:480 0.0021 33 21,212 1:643 0.0016 1995 8 3956 1:495 0.0020 52 21,169 1:407 0.0025 1996 4 4070 1:1018 0.0010 43 21,089 1:490 0.0020 Average 5.4 1:732 0.0015 49.9 1:462 0.0022 Accident data from the Transportation Safety Board Registration data from Transport Canada Safety and Security The accident rates for ultraights varied from a high of 0.0020 to a low of 0.0005. The rates for general aviation varied from a high of 0.0029 to a low of 0.0016. Ultralight activity shows a lower rate of fatal accidents than general aviation. Conclusion: The data shows that accident rates for ultralights are lower than for general aviation aircraft. The data does not support the perception that there is more risk involved in flying ultralight airplanes than in flying general aviation airplanes. Conversely, the data demonstrates that ultralight activity is actually safer than general aviation activity. Prepared by Kathy Lubitz, Dec. 1997

Comment NO: 1752	User Name: BigSkyAviation

The part 103 training community has had a tremendous positive impact on safety of the ultralight / light aircraft category. The NTSB database was littered with fatalities before the 103 training exemption was instituted. There have also been great advances in engine reliability, component design (propellers, strobe lights, hand-held radios, GPS, intercoms, seat belts, parachutes) during the last 17 years. Also, the NTSB has lessened the investigations of light experimental / ultralight crashes. The ultralight community has been self-supporting in the reporting of design defficiencies, engine operation techniques, flying knowledge base. Moving to a system of sport pilot instructors will probably lose that self-supporting knowledge base as "old heads" decide not to participate in the new system. It is my opinion that in time the accident rate of light planes will increase if the NPRM is made law. Using the excuse thet the record keeping was lax during the 103 exemption period may give the proponents of the new rule ammunition for sustaining the new rule. But the fact is that light planes are being flown safely now under the 103 exemption by pilots with no medicals who are maintaining their own planes.

Comment NO: 1765	User Name: edburkhead

No Comment

Comment NO: 1823	User Name: megamouse

Generally expect decrease in actual accident rates, although statistics may more relfect the increase percentage of reported accidents rather than actual rate. Don't think that most light unregistered accidents are reported, because perceived lack of benefit by involve parties.

Question Number 3 - The FAA is proposing to require sport pilot certificate applicants to hold an airman medical certificate or to possess a valid and current driver's license. You can find the reasons for this proposal in Section VI-Section By Section Analysis of the Proposal under the heading "Part 61 SFAR No. 89," proposed section 15. Do you agree with this proposed requirement? Why? Why not?

(3) The FAA is proposing to require sport pilot certificate applicants to hold an airman medical certificate or to possess a valid and current driver's license. You can find the reasons for this proposal in Section VI-Section By Section Analysis of the Proposal under the heading "Part 61 SFAR No. 89," proposed section 15. Do you agree with this proposed requirement? Why? Why not?

Visited: 533	Total Comments: 183	Last Post: 5/6/02

Comment NO: 16 **User Name: delta2ul**

This option provides the opportunity for an individual to participate in aviation at a much lower cost.

Comment NO: 20 **User Name: clelandr**

No Comment

Comment NO: 24 **User Name: DartHere**

Disagree Waving the Medical requirments puts into question the point of having a Medical requirement for Private Pilots. If you are physically un-fit to fly, then what mankes the person MORE fit to fly Light Sport Aircraft? The best example of this problem can be found in the number of comments from OLDER Pilots who have had their Certificate pulled because they couldn't pass a physical who now like the NPRM because they want to fly again.

Comment NO: 43 **User Name: capella1**

We believe the medical certification requirements as proposed are appropriate for the operation of Light Sport Aircraft in day VFR conditions for the purposes of sport and recreation, within the altitude limitations specified.

Comment NO: 57 **User Name: cbranagh**

I believe the allowed use of the drivers license for medical fitness is a good idea. If I can drive a car I should be able to fly a sport aircraft.

Comment NO: 62 **User Name: rjpetit**

While I agree with a less restrictive, less costly medical, the "driver's license" medical has some issues. The rules for getting a drivers license vary dramatically from state to state. Does a pilots ability to fly change if they move from a state where they can get a drivers license to a state they can't? One of the following should be true: 1- The requirements of the most flexible state are ok in the eyes of the FAA. In this case maybe the rule should read "could hold a US drivers license" instead of "must hold". 2- Some other requirement is acceptable to the FAA. In that case the requirement should be specified. A prospective pilot could sign a form stating they meet the requirments. 3 - Because of the variation in the rules for driver's licenses, the FAA believes that the pilot is responsible for certifying their health when they fly. In this case why not have "self certification" similar to how it works for gliders and ballons now?

Comment NO: 64 **User Name: flyfree**

No Comment

Comment NO: 79 **User Name: Bradley**

No Comment

Comment NO: 93	User Name: artspain

Agree. This is one of the most important parts of the proposal. Current medical requirements are a boondoggle.

Comment NO: 94	User Name: Bill Cartwright

I agree with this approach and hope it remains untouched.

Comment NO: 118	User Name: w1bfn

Excellent! after all, I have been self-certifying with my 3rd class medical for 364 days per year.

Comment NO: 137	User Name: daberti

The requirement of a third class medical (for even private pilots) is ridiculous. I welcome the change, next get rid of the mandatory retirements at 60 for the ATP pilots.

Comment NO: 154	User Name: barnesrc

By easing restrictions on medical certification, many pilots who are currently flying less than they would like too or should to maintain proficiency just because their medical is expired, will likely fly more often and will greatly enhance their proficiency and safety.

Comment NO: 170	User Name: Ultraliteteacher

This proposal, being more lenient than GA, is in the correct direction. The self certification process would be superior. Nothing is worse than a rule which gives you false confidence. If I have my medical or DL then I am in good shape to fly. Bologna. if I, standing before my aircraft have ANY doubts about my abilities, then I must be in charge of grounding myself. This is what should be taught. This is what should be the rule. There will never be anyone that will know if I am fit to fly at the time of my flight better than me. Anything less is me fooling myself and the world.

Comment NO: 195	User Name: sthomason

Agree. Pilots always self-evaluate before every flight. Glider pilots will pose the same risks to the population as the light aircraft, so the medical qualifications should be roughly the same. The additional requirement of a driver's license covers the increase in risk that the public may perceive, and is appropriate for the weight and speed of the aircraft we are discussing.

Comment NO: 209	User Name: Batson

I agree with the requirement of a valid drivers license or a 3rd class medical. The medical requirements for a drivers license are more then adequate for this type of flying. The safety record of balloon and glider pilots is excellant and no medical requirements exist for these. Thus I strongly ask that the NPRM stay as written in this aspect as simplicity is the key to its sucess.

Comment NO: 227	User Name: nleggett

I agree. Flying should not be limited to just a physical elite. Self certification has worked well for gliders and balloons and it would work well here too. Nick Leggett

Comment NO: 239	User Name: Dennis

I agree. Private pilots should self-certify themselves medically also.

Comment NO: 248	User Name: E002SA

Yes, this makes sense.

Comment NO: 264	User Name: dalemseitzer

There are some medical requirements to get a drivers license and that should be enough. A drivers license medical is enough if the planes have a max gross weight of 1050 lbs and max speed of 99 mph and a stall speed of 39 mph.

Comment NO: 274	User Name: Barac

I agree and disagree. I believe this would be an opportunity for individuals that don't wish to or can't keep medical for a "disqualifying" reason, although that person may still be a safe pilot.

However, I see in FL, and other states, that seniors (and some younger) who can't see a hand in front of their face or can't even stand steadily, yet renew their drivers license through the mail year after year. If you are going to use drivers license as alternative to medicals, you should require that no "by mail renewal stickers" be permitted. All seeking to use their drivers license as their medical should be required to submit to drivers license renewals in person. That is the ONLY way to keep it this part of the requirement safe.

Comment NO: 294	**User Name: EricDL**

I am aware that the sport pilot certificate would be advantageous to many pilots who have lost their medical, and I agree that somtimes the medical examination is too stringent for private pilots. I would submit that if the FAA can have a less stringent license, why can't they have a less stringent medical for that license? While a person might not need to be in absolute perfect medical health for this rating, it would be nice to know that fellow pilots are at least in control of all their faculties before sharing airspace.

Comment NO: 296	**User Name: deeph2o**

If you are fit to fly you are fit to fly, if not no. If you truly believe that a driver's license is proof of health enough to strap into an airplane and take off, then make it the case for all fixed wing pilots. I don't think so.

Comment NO: 305	**User Name: oneidiot**

I know a few Pilots, I have flown Simulators. I think even a sports Pilot should receive no less hours of training Than anyother Pilot or go without a medical exam. I do hold a CDL I get a Medical Exam every two years and I drive within the city. I personally think EVERYONE who Drives should have to take a DOT Phyical every Two years NOT just Drivers and ALL Pilots

Comment NO: 306	**User Name: fondahn**

Agree. A good analogy to Sport Pilot is when the vehicle Commercial Drivers License came out only a few years ago. Many CDL holders said it was ludicrous that a professional driver had to get the new license for anything larger than a pickup truck and almost anyone can get a drivers license to drive a forty foot motor home with car or boat in tow. They predicted high accident rates for the older people in the motor homes, and it just hasn't happened. Despite our fears, the automobile license process for non-commercial drivers has worked well, as it will for Sport Pilot.

Comment NO: 311	**User Name: garyo**

It has been proven in the ultralight field that even a drivers license does not make it unsafe. The concept of self evaluation, as adopted in UL, has proven effective in REDUCING incidents. I believe the non commercial, owner/builder, recreational for fun pilot is going to naturally be more concerned about his saftey than those who are required to fly (to check a pipeline for instance) in a rented multiuse general aircraft that most of them use, simply because they half to. Or loose their job. Yes, I definately agree that Drivers license medical is a reasonable requirement.

Comment NO: 325	**User Name: challengerpilot1**

If a person is allowed to drive a 4000lb vechicle in streets then surely they can pilot a 1200lb airplane.

Comment NO: 340	**User Name: Goflyslow2**

Propose D.L medical for Rec pilot. See how quickly support for Sport pilot will drop. The D.L medical is the only reason for considering this proposal.

Comment NO: 347	**User Name: thetac**

I would argue that a valid and current DL has absolutely nothing to do with a persons state of health. As has been said before you can renew your DL by mail in some states. I'm a pilot myself and I don't necessarily like paying out the money for a physical every couple of years but at least the public and my fellow pilots can be assured that a professional in the health field has found me to be medically competent to exercise the rights of a pilot. If the FAA is going to waive this requirement for a sport pilot, then they better waive it for the entire pilot population, including

ATPs! After all flying is flying right? Let's take it a step further, what about those CDLs? They don't need special medicals or do they? What's the difference between driving a 4000lb automobile or a 30000lb truck, I mean "physically" what exactly does a truck driver need compared to someone operating an automobile from a medical standpoint that is (besides some hands on experience which has nothing to do with a persons medical condition)?

Comment NO: 352	User Name: Gene

No Comment

Comment NO: 377	User Name: wjwil

I value my life very much and I would think most pilots do.If I don't feel good,have a headache or anything I feel that would affect my performance while piloting I don't fly.I can't understand why a sport pilot only has to have a drivers license and a private has to have a III class medical.The medical stops a lot of perfectly fit pilots from flying because it becomes so expensive to maintain the physical.A perfect example a friend went for a physical and his blood pressure was above normal.He was required to start medication,which was good because he needed it under control,but he was also required to take a stress test and have blood workups done.He was told he would have to have this done each physical.I'm sure you know what these test can cost.He can afford this but why should he have to if a sport pilot can continue to fly without all these test every two years.This part of your proposal is totally unfair.

Comment NO: 381	User Name: jim

Yes, I have a current 3rd class medical which I have no problem passing. It only says that at the moment I passed I was ok. It does not guarantee how I will be two hours later. For fun flying (not for hire) I don't believe a medical is needed. All the pilots I know do not fly on days that they may not feel their best. I also believe this would be true for pilots without a medical.

Comment NO: 384	User Name: v2twin

Strongly agree. The medical requirements to pilot the type of aircraft envisioned by this rule are not comparable to the reqts for flying say a turbo-210 in IFR conditions. The risk to the public at large is minimal, these aircraft should be well within the capability of the average driver.

Comment NO: 386	User Name: bobkat

Absolutely!! As a phyusician, I see many pilots who have lost their class 3 medicals for minimal reasons. They can drive cars, motorhomes, Ryder trucks, etc. but cannot pilot a 1500 pound airplane. Many of these pilots cannot afford the repeated and costly medical examinations and tests, send all of it to the FAA in Oklahoma City, then "hurry up and wait" The ones that do persevere and get their medicals reinstated usually only have a few months of flying before they have to start over again with the expense, exasperation, etc. Lots of them, especially in rural areas simply keep flying their cubs, chanps, homebuilts, etc. from small uncontrolled fields, private airports when available, etc. Unfortunately, a lot of them stop getting annuals for their planes and proper maintenance as they tend to take adopt the idea that if they are caught for one thing, what does it matter if they have a second violation, etc. I firmly believe that class three medical should be dropped both for the sport pilot and regular flying, too.

Comment NO: 391	User Name: jwalters

The problem I see here is , did the person operate a part 103 aircraft and for how long? If an individual did in fact operate a fixed wing a/c of 103 standards then a drivers license only would satisfy me. If the person has no or not recent (at least six months) appreciable flight time, then a third class is appropriate. But this still lends to question, What are the normal minimum flight instruction hours necessary?

Comment NO: 400	User Name: johnclay

I agree with the reasoning in the NPRM. However, state regulations regarding drivers license renewal vary quite a bit and this may cause some disparity in licensing pilots. I would like to see the final rule address the issue of DL renewal variation across states.

Comment NO: 417	User Name: ch900

I agree. There are some nonuniformities between states that must be accepted. Each pilot, of any type, must certify themselves each time they fly (61). Do not allow renew by mail DL. This provides a large opportunity for otherwise fit and safe pilots to fly who do not meet the requirements for Class III. Some organizations seem to be interpreting the "daily self-certification phrase" (61) very narrowly and saying that it means that any pilot using any medication that for some people may impair their ability to operate machinery (most medications), many not honestly "self-certify" (61) for the day's flight. I am presuming the FAA will not adopt this narrow and erroneous view. States allow the operation of high speed and heavy vehicles in congested environments based on demonstrated competence with medications that do not impair the particular candidates ability to operate machinery. Use of such demonstratedly safe medications is acceptable public risk. There needs to be a prohibitory provision for those convicted of DUI/DWI.

Comment NO: 428	User Name: pat

yes but... i think 3 things should be acceptable 1. a third class or higher medical 2. a valid drivers license 3. a cerificate of health (similar to a third class medical) that is issued by a general M.D or D.O. this would be for the few people that are healthy enough to fly but do not or can not drive.

Comment NO: 432	User Name: hawkul

I think even private pilots should have the chance to fly day time VFR rules with only a drivers license medical. Night flights and IFR flights should require additional training and a third class medical if you want those privleges.

Comment NO: 444	User Name: whiteman

I fully agree with this provision. Flying is on more stressful than driving on the intrastate system. The glider and hot-air balloon guys have it. There is no medical requirement for FAR part 103; and it seems to have worked out for these many years. Finding an AME can be a costly and time consuming process.

Comment NO: 448	User Name: hawkdrvr

Recreatioal and Private pilots should have the chance to fly day time VFR rules with only a drivers license medical.

Comment NO: 459	User Name: Buford111

Every time a safe pilot prepares to fly, there is a self-certification process that must occur - "Am I physically and emotionally ready to make this flight?" As long as this process remains in place, there is no reason to require a non-commercial pilot to hold an airman medical certificate.

Comment NO: 462	User Name: creilly

No Comment

Comment NO: 465	User Name: Steve

I very strongly agree. Each time a pilot prepares for a flight he must ask himself if he is phisically prepared for that flight. A medical cert does not make one fit just because it is in your wallet. Given the type of aircraft this proposal addresses and the conditions for use any one operating a lite sport a/c will be less of a safety hazard than they would be driving on any highway. Bottom line the pilot must make the self certification befor each flight weather he has a med certif in his pocket or not

Comment NO: 475	User Name: William G. macIntyre

We all must legally self certify our medical condition each time we fly. Either remove the medical reqirement for non-commercial flight or have the flight docs certify pilots health and assume all legal liability for health related accidents (there are very few). I would bet there would be no single pilot flight, pilots over 35, or medicals other than 1st Class with such a change in liability. The medicals are at best a hassel that inhibits the growth of general aviation.

Comment NO: 482	User Name: kepfordj

Most pilots I know are responsible people who know if they are not up to flying a plane.

Comment NO: 488	User Name: W6KOW

Use of either an FAA medical exam or implied medical standards from having a U.S. driver's license seems like a fine idea for sport pilots...as indicated by decades of experienced with glider and balloon pilots, who reaquire only a personal statement of fitness, not an FAA medical.

Comment NO: 506	User Name: dmyhra

I beleive the savings to new pilots, by not having to pay an AME for a FAA Medical Exam. will make it affordable for more people.

Comment NO: 529	User Name: Dan Bergstrom

I am in agreement with the new medical requirments. People with drivers license are allowed to drive 8000 pound SUV's down crowded freeway at 75 MPH. I believe that same person ought to be able to pilot a 1200 pound, light plane through the air at around 100 mph. We have always been self- policing ourselves on medical issues. When I don't feel well, the last thing I want to do is go flying. I fly for fun ....flying sick is no fun.

Comment NO: 533	User Name: slowflyer

I agree, the valid current drivers license is a great idea.

Comment NO: 536	User Name: steve.stefanic

I agree entirely. If it works for gliders, why wouldn't it work for "light sport" aircraft. If ballon pilots can "self-certify" why wouldn't a driver's license work for "light sport" aircraft. If we allow millons on the highways with driver's licenses, why not allow several hundred thousand in the air with a driver's license? The highways are still much more dangerous because all of those aggressive drivers who are easy to spot are still a hazard to us all, even if they did have 60 hours of training. Safety is an attitude that only a CFI can evaluate properly. 100 hours of training & a first class medical cannot make up for a safety oriented attitude. Read the NTSB reports & marvel at some of the poor attitudes & decisions carried out by "highly trained professionals". The medical & the training can't make up for a pilot with a bad attitude, dis-regard for safety or poor judgement. Keep this requriement "as-is"

Comment NO: 540	User Name: 584241

It works for sailplanes and ballons. It is difficult for the bureaucratic mind to realize that every day, thousands of people operat automobiles while under the influence of drugs and alcohol (bureaucrats included) but few pilots fly when they don't feel well. Sport pilots, in particular, don't have that "must get there" attitude.

Comment NO: 565	User Name: stewart

I think that the driver's license medical is fantastic. I would strongly reccomend that the FAA eliminate the third Class medical for private pilots.

Comment NO: 578	User Name: Taylorcraft078

I agree that elimination of the 3rd class medical is a good idea. The assumption that a driver's license is a substitute is lost on me. The NY driver's license has nothing to do with medical ability to drive. This may be a barrier to younger pilots who will be able to solo before driving. It is getting difficult (and expensive) to maintain the medical as there are not many doctors able to issue it. I use doctors in Rochester, NY for mine. I am clicking agree in order to make sure that there is no confusion that I think the 3rd class is a good idea for private pilots. I would be more fairly classed as thinking that self certification, as in gliders, is a better idea.

Comment NO: 580	User Name: goluscombe

I think the the driver's license proposal, along with the limitations on the aircraft weight, speed, seating and the night time restrictions was an excellent choice. I know glider pilots fly without the burden of a medical and I would venture to guess that vehicle accidents due to a incapictating medical condition is failry rare and, should it happen, the "lethality" of the Sport Pilot airplane has been restricted by the proposal.

Comment NO: 607	User Name: gerryg

I agree strongly with the change in relaxing the requirement of a 3rd class medical...I believe they should also relax the requirement for both the Recreational and Private Certificate, but not for the Commercial.

Comment NO: 610	User Name: cec1155

I think that a third class medical should be required. State drivers license in some states can go for as long as six years, this is too long between checks for aviation.

Comment NO: 622	User Name: greywing

I agree with the proposal. Having a third class medical does not prevent in-flight health hazards.

Comment NO: 626	User Name: Dennis Estenson

I agree, also, why not have all non-commercial pilots medically self-certify themselves. FAA medicals are antiquated and do not keep up with modern medicine.

Comment NO: 636	User Name: jwg

Completely agree. Third class medicals have become a bit more realistic over the years, but they are still antiquated. Far more people are placed at risk by someone driving and SUV at 65 on a two lane road than could conceivably by threated by a sport plane pilot. Rare exceptions not withstanding, pilots tend to be pretty responsible group. I do not think that would change.

Comment NO: 643	User Name: towpilot

Quite reasonable! Anyone healthy enough to hold a driver's license is healthy enough to fly a Sport aircraft.

Comment NO: 650	User Name: Triplek45

I agree with the DL medical. I think the FAA 3rd. class med is too restrictive, this is "one" reason that GA is declining.

Comment NO: 652	User Name: glaunt

Excellent Criteria....I would surprised that the EAA would not be in favor of this.

Comment NO: 668	User Name: aeromac

I agree. Several other areas of aviation use the same principal. The aircraft are lower, slower than regualar. This gives the instructor the sign off(instead of no one with a fat UL.)

Comment NO: 674	User Name: Flyguy958

I think the lack of a medical will not affect the safety of pilots.

Comment NO: 682	User Name: go4it2oo

I agree

Comment NO: 694	User Name: Steve

Strongly agree. I belive self certification is long overdue. Every time any pilot prepares to fly any airplane he is responsable to decide if he is safe for that fligt phisically as well as mentally. We do this every time we fly. This propasal will do much for those who cannot afford to have test after test done only to prove they are safe to fly there light a/c in day vfr rural areas.

Comment NO: 707	User Name: Steve

agree agree agree this should be the rule for all recreational and sport pilots.

Comment NO: 721	User Name: Wayne McIntosh

Yes I agree, the simple nature of the proposed aircraft and the daytime VFR only do not require more.

Comment NO: 726	User Name: FlyDiver

Well done FAA! No changes needed.

Comment NO: 749	User Name: j-b-tarkington

Yes, this is a big step in aviation. Eliminating the need for a medical certificate for pleasure flying is fantastic.

Comment NO: 751	User Name: jrhorsley

I agree with this prposal,i don't feel flying is any more stressful than driving.If a person is well enogh to drive,they should be able to pilot a small plane

Comment NO: 758	User Name: mccoy3

The glider community with self-certification has done as well as or better than the powered aircraft community has using medical crtification. I think for day, VFR flying of non-complex aircraft self-certification would work as well as it has in the glider community. The valid driver's license is a reasonable proposl that could save a lot of cost and delay in flight training..

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Comment NO: 769	User Name: Rich Wallin

Sport pilots as well as most of the rest of us that are private pilots fly for fun. We know when we are not fit to fly. Even if we have an FAA medical, we do not fly when we are not fit to fly.

Comment NO: 789	User Name: airgus

I agree that some sort of medical fitness evaluation should be required. The 3rd class medical should be replaced by a medical self certification and a current drivers license, which will take care of the vision test and provide added GA security.

Comment NO: 796	User Name: Albx

at the risk of being criticized, an faa medical is only good to the door of the examiners office... after that, all flying is self certified... a simplified medical assurance would benifit all, including private and commercial.

Comment NO: 801	User Name: adagio

I completely agree. I also,strongly, believe that all non-commercial pilots should be able to self-certify with a valid drivers' license. The current bureauracracy serves only an exclusionary function. It does not, in my humble opinion, improve safety one whit.

Comment NO: 806	User Name: Riggs

The recreational pilot certificate should be the same as the sport pilot using a 3rd class medical or a drivers license. The privileges are very similar.

Comment NO: 810	User Name: robertthomas

Ground school should cover, in depth, the cause and effect of such medical conditions as nasal congestion, which is essentially harmless while driving but potentially deadly while flying(i.e. reverse blockage).

Comment NO: 811	User Name: Frank Dykas

I wholeheartly agree. It makes no sense to allow someone to drive an automobile on the interstate highways at 75 mph and restrict these people from flying safe, slow aircraft.

Comment NO: 813	User Name: tebrahim

I agree,flying sport airplanes is no more dangerous then driving a car at 70 mph five to ten feet away from another vehicle

Comment NO: 827	User Name: gkrug

The driver's license shows DWI, Eye correction needed, etc., which is adequate for us to drive all size and weight vehicles, pull trailers and boats, at all speeds a few feet from harms way and most of us do it safely. The FAA medical seemed aimed at more stressful tasks like military and commercial pilots who often fly IFR. The Sport Pilot is a daytime, VFR pilot.

Comment NO: 847	User Name: johnckircher

I disagree because this proposal moves previously unlicensed flyers in the open air into a legal position of having to have the "privledge" of using the skies to move about. Is our security so important that we have to give up ALL our freedoms to any cop who can stop us at will?

Comment NO: 853	User Name: David Hodgson

No Comment

Comment NO: 867	User Name: frjn33

One responder says that this proposal would make medically UN-fit pilots under the present requirements, legally FIT under the proposed. This is not so. One reason that someone might not be able to pass the 3rd class medical would be due to taking a medication which had not made it onto the approved list because of bureaucratic lag time. Should the medication not interfere with a person's driving ability, it certainly shouldn't interfere with one's flying ability in such simple aircraft under VFR conditions. Have you ever driven a motorcycle in heavy traffic? In my experience, that places a greater stress on a person than does piloting an aircraft which would fall into this category.

Comment NO: 870	User Name: windele

I believe that pilots with lost medicals shoud be allowed to fly larger airplanes by themselves. My main concern is heart attacks. I'm not sure that a person with serious heart problems should be allowed to fly another person.

Comment NO: 892	User Name: Spdrflyr

Good for you! This is awsome and courageous! It's about time the FAA realized that your medical profile for class 3 has not kept pace in medical advances. This one element ought to invigorate Sport Aviation like there's no tomorrow.

Comment NO: 899	User Name: tbrandt

Yes, given the role, size, speed and number of occupants in the aircraft. Generally, this parallels the way it works for glider pilots now. The emphasis and reminders are that the pilot is the key and does not fly at times of medical deficiency.

Comment NO: 914	User Name: Gator

Generally speaking people who love flying don't like dying. There are exeption to this rule however but a medical problems aren't one of them. I've been getting 3rd class medical certificates but feel that I'm throughing money away. Do I know if I'm going to win the Loto? NO. Do I know if I'm fit to fly..YES! Like many pilots who don't take risks, I don't fly unless I'm certain I've done everything I know to do to make a safe flight. GO FAA! Let's be Americans

Comment NO: 920	User Name: Sam Kennedy

It is burdensome and an unreasonable requirement for pilots of small aicraft to have third class medical certificates

Comment NO: 924	User Name: Skeeter

I very much agree. It is long overdue.

Comment NO: 927	User Name: berry

I had to take a day away from school and pay my own money for my medical exam. This is really ridiculous for a 16 year-old.

Comment NO: 929	User Name: lavasseur

Public safety could be severly degraded if pilots of substantial aircraft are allowed to self certify their medical condition. Last summer I visited with Mr. Garvey about sport pilot. While I waited to speak to her a GA pilot on some kind of medication spent considerable time trying to get Ms. Garvey to say he could fly under sport pilot while medicated. That kind of mentality scares me. Sport pilot will allow an aging GA pilot base that can't pass the third class medical in the air over congested area. This is not a good idea. Any pilots who can't pass a medical should fly ultralights away from congested airspace.

Comment NO: 932	User Name: gkrol

The aircraft allowed for sport pilot pose no more danger than other aircraft that allow self certification, less danger than an auto, and much less than a large pickup or SUV). For this type of flying a 3rd Class medical can be very time consuming and expensive if the pilot is of even slightly marginal health. The need to meet the standards for a driver's license seems proper.

Comment NO: 942	User Name: Terry Davis

The drivers license medical is the keystone of this whole rule and I think it is entirely adequate as a measure of health and fitness to fly a light aircraft of the proposed weight. Every pilot with a medical self-certifies himself every day after he walks out of the AME's office, this is no different. The Recreational Pilot rule flopped so badly because of the loss of the original medical provision, it was asking for too much aircraft weight and speed. I hope that kind of failure won't happen here. This is a good rule.

Comment NO: 957	User Name: dfreeman

I believe that the requirement for a valid state drivers license and the ability to self certify is more than adequate to maintain a safe margin for operation under the new airman classification. I also am in favor of a change to the regulations that would allow the same privileges for both the Primary Certificate and Private Pilot Certificate. I think the current medical standards are far too restrictive and result in excessive cost to the individuals that have minor problems meeting current class III medical standards. I do believe that the current class II and III standards are good for those individuals that are working for higher certificates and planning on obtaining instrument, commercial, and higher certificates and ratings.

Comment NO: 973	User Name: thorerik

I want to learn to fly. I can't believe all the hoops I have to jump through (medically) and expense I have to go through to satisfy the FAA! If I can drive a car safely I can fly. The pilots I have met seem like pretty responsible people and I know when I should or shouldn't fly. I think it's time to drop the medical for even Third Class Private Pilot.

Comment NO: 982	User Name: kcmalls

This is one of the best aspects of the proposal. Pilots will self certify. There are very few accidents linked to a medical incapacity of the PIC. Even pilots with a current medical need to self certify.

Comment NO: 994	User Name: rotter

I AGREE HOWEVER I THINK THE OPTION FOR DRIVERS LICENSE SHOULD BE AVAILABLE TO THE PRIVATE TICKET ALSO. THE RESTRICTIONS ON HOLDING A DRIVERS LICENSE ARE MORE THAN ADEQUATE AS A CONTROL TO INSURE GOOD PHYSICAL CONDITION AND GOES FARTHER VIA THE DRIVING RECORD TO INSURE PROPER ATTITUDE AND JUDGEMENT.

Comment NO: 999	User Name: George

This is a sensible approach to day VFR requirements. Balloon operator and glider pilot records (including powered gliders) have shown that a no medical requirement constitutes no increased problem in this type of operation. It will reduce costs, put a few back in the air who otherwise would not fly and, really, 911 not withstanding, very, very few of us set out to have an accident.

Comment NO: 1001	User Name: johnhenderson

I strongly feel that aviation need to progress to be an activity for normal people -- not supermen. To me, for the amount of flying I want to do recreationally a medical is a waste of time and money -- including FAA time and money to process them. I believ the incidents of medical related problems in flight to be extremely rare and many of those were not predicted by medical exams. The Sport Pilot action to use a State Driver's License is a start ans I support going even further to eliminate or reduce medical requirements for other pilot certificates.

Comment NO: 1009	User Name: bampbs

Considering the extensive privileges of a private pilot, it makes sense to have a lower requirement for much smaller privileges. Driver's licence makes sense - the energy under control argument is persuasive. The relative proximity of other vehicles of similar energy on the highway makes it compelling. The potential danger to others is vastly higher on the roads.

Comment NO: 1014	User Name: Forrest Barber

This is very good, the State Drivers Licence will provide the Photo ID and all necessary data required. I do not believe it will be abused in any way by those not medically fit to fly.

Comment NO: 1017	User Name: Harold E. Thomas

I think this is a good idea and would probably encourage more men to get a pilots license and fly more if they could start out with few restrictions and grow into a regular private license.

Comment NO: 1027	User Name: Robert

I think the Ruling is Infinitely Splendid. I know for myself if I feel "slightly" out-of-sorts on any particular day, I won't Fly. And a lot of "ON PAPER" Physical Conditions That Technically are Flying Prohibitive, in Reality are nothing more than Paper Work Generators.

Comment NO: 1033	User Name: RFI

I agree with the proposal to accept a valid drivers license in lieu of a medical certificate. Balloon and sailplane pilots have been self certified since the day one and there has not been an unusual number of accidents related to medical problems. We drive on two lane highways at closing speeds of 130+ Mph with out a medical certificate, so I see no reason why sport pilots flying simply for recreation should not benefit from the same set of circumstances.

Comment NO: 1052	User Name: terryo

For the great number of us that fly less than 50 hours per year this is an expense, (medical exam) that adds to our financial burden.

Comment NO: 1065	User Name: chuter

Yes, I agree.

Comment NO: 1069	User Name: thumper

A person driving a car is more likely to destroy property and/or injure innocent bystanders than a GA pilot if a medical condition surfaced while operating the associated vehicles. The current Medical requirements are NOT needed.

Comment NO: 1073	User Name: gyrobee

Currently, sailplane pilots function with essentially a "self-declaired medical. Part 103 pilots have no official medical requirements. If one examines accident data for both of these categories, medical incapacitation or impairment do not seem to be significant issues.

Comment NO: 1079	User Name: Gyroman

I fully agree with this propsed requirement. Medical incapatation does not seem to pose a significant threat. Most people tend to act in a responsible manner and they would refrain from flying if they felt they would place themselves in danger.... Of course there are always exceptions to this --but in reality these people will continue to fly/drive or whatever reguardless of their situation --they are the exception not the rule however!!

Comment NO: 1095	User Name: Flymo

Agreed. Cars and vans represent a greater danger to the public than the low kinetic energy of a gyro.

Comment NO: 1096	User Name: bruce2

agree I self certify every time I fly or drive for that matter This will give a lot of folks a chance to fly or keep flying

Comment NO: 1102	User Name: fatplane

This is a reasonable requirement, although the fat ultralight safety record is already outstanding. As you mentioned, there are already over 10,000 unlicensed fat ultralights flying in the USA today, without licensed pilots.

Comment NO: 1107	User Name: Topspin

I agree! Finally someone is thinking logically. It has never made any sense to require a pilot, other than commercial, to submit to higher medical requirements than an auto driver. I guarantee that more people are targets for safety incidents in a week of my driving the local freeways than there ever would be in a lifetime of my flying.

Comment NO: 1122	User Name: J Brady

ok because of the type of aircraft the proposal will cover

Comment NO: 1133	User Name: 21214

Glider and Balloon pilots may already self-certify their medical condition. If an aircraft is not carrying passengers, than no medical should be required. I have no problem with a driver license requirement.

Comment NO: 1136	User Name: rotopup

If you're healthy enough to safely drive a motor vehicle in today's traffic, you should be capable of handling a simple aircraft.

Comment NO: 1169	User Name: jonvee

The DL medical is a good idea.

Comment NO: 1177	User Name: heronium

No Comment

Comment NO: 1181	User Name: Bob L

I agree with the requirement for a valid drivers license. This will exclude persons with drug and alcohol arrests from flying our skies.

Comment NO: 1206	User Name: Russ King

No Comment

Comment NO: 1207	User Name: Russ King

Agree

Comment NO: 1212	User Name: PWPlack

I would be a proponent of requiring a certificate equivalent to the current Third Class Medical for Sport Pilots, with special accommodation made for individuals with records of successful management of medical conditions such as diabetes and heart disease. A state-issued driver's license seems too lax.

Comment NO: 1220	User Name: helitim

Many aviators who can no longer fly due to health constraints would be allowed to fly if only a drivers license is required. We all know how easy it is for many elderly and otherwise marginally healthy people to obtain a drivers license in most all states. I believe having to pass a flight physical before being allowed to continue aviating is not an unreasonable requirement. You can always pull your car over to the side of the road if you feel ill, but landing the plane is not always so easy and consequently should require a higher level of mental and physical capacity than aquiring and maintaining a drivers license.

Comment NO: 1229	User Name: SPAANS

Med. Cert. for all pilots

Comment NO: 1255	User Name: Dugaru

A driver's license should be enough. There's no showing that the Class III medical requirements (and onerous paperwork for exemptions, etc.) have ever contributed to safety. In fact, the current regime probably leads pilots to avoid doctors and treatments (e.g., depression), thus decreasing safety.

Comment NO: 1263	User Name: skiptyler

No Comment

Comment NO: 1270	User Name: James48843

Agree no Class III medical should be required. However, please adress in the final rule whether you intend that pilots who have failed to meet requirements for a class III medical, or who's medical has lapsed, and they know or suspect they no longer meet requirements for a class III medical, should be allowed to fly. What "known medical defects" would you intend to make as a automatic grounding of the pilot? If they have high blood pressure, a history of cardiac problems, etc, do you want them in the air if they still have a driver's license? Please make this clear in the final rule.

Comment NO: 1278	User Name: Goflyslow2

The FAA, in 1995, proposed (NPRM 95-11) to allow Recreational pilots to exercise privlages without a medical endorsment. This proposal was not enacted due to numerous reasons including safety concerns. I find that there have been no substantial changes in need or requirements for safety in the interm. Therefore; this proposal should be denied. A complete text of 95-11 may be seen at: http://www.avweb.com/other/nprm9511.html Pertinent Copy text from 95-11 below; The FAA is proposing to allow pilots who hold recreational pilot certificates and those higher rated pilots who elect only to exercise recreational pilot privileges to operate aircraft without a medical certificate. Specifically, this proposal would include student pilots who are seeking a recreational pilot certificate, holders of a recreational pilot certificate, and holders of a higher pilot certificate who elect only to exercise the privileges of a recreational pilot certificate.

This proposal would be a significant departure from long-standing FAA policy. Since the early 1930s all pilots, except glider and balloon pilots, have been required to hold medical certificates in order to exercise the privileges of their pilot certificates. The FAA determined that medical certificates were required for the purpose of ensuring the safety of the pilot in command and passengers, and also for the safety of people and property on the ground. As a result of the EAA petition discussed earlier and the interest shown in the general aviation community, the FAA is seeking wider comment on whether recreational pilots and holders of a higher pilot certificate who elect to exercise the privileges of a recreational pilot certificate should be required to hold medical certificates. The FAA is also seeking data on any safety or other public interest concerns that may arise from obviating any review of medical qualifications by medical professionals. Pilots applying for a recreational pilot certificate would be required to certify at the time of application that they have no known medical condition or deficiency that makes them unable to operate the aircraft in a safe manner. This requirement parallels the provisions that are now provided to balloon and glider pilots under the current rules. This proposal would prohibit pilots from exercising the privileges of a recreational pilot certificate if they have a known medical condition or deficiency that would make them unable to operate the aircraft in a safe manner or if they are taking any medication or receiving other treatment for a medical condition that would make them unable to operate the aircraft in a safe manner. (This ongoing obligation is discussed in more detail under the section-by-section analysis.) The FAA is not proposing specific medical standards for this pilot self-evaluation but instead are proposing that pilots self-evaluate prior to each flight whether they have any medical conditions that would inhibit their ability to operate the aircraft in a safe manner. The FAA would rely on the pilot's knowledge and judgment as to their medical fitness for conducting each flight. The FAA strongly encourages the public to comment on whether there should be specific medical standards upon which the pilot should base their self-evaluation. If so, what should those standards be? In particular, the FAA would like comments in response to the following questions: (1) Should the rule specifically prohibit holders of pilot certificates who do not also hold medical certificates from flying if they know or should know that they have certain conditions? For example, should the rule exclude persons who believe that they have no known medical deficiencies even if they know, or have any reason to know, that they have: (a) A visual problem, e.g., vision un-correctable to at least 20/30? (b) An equilibrium problem? (c) Alcoholism to the extent that the intake of alcohol has caused damage to their physical health, personal or social functioning, or is required to enable them to perform normal functions? (d) A drug dependence? (e) A personality disorder, neurosis, or a mental condition that makes them unable to safely operate a vehicle or machinery? (f) Epilepsy or a disturbance of consciousness without satisfactory medical explanation of the cause? (g) A convulsive disorder, disturbance of consciousness, or neurologic condition that makes them unable to safely operate a vehicle or machinery? (h) A myocardial infarction (heart attack), angina pectoris, or a coronary heart disease? (i) Diabetes? (j) An organic, functional, or structural disease, defect, or limitation that makes them unable to safely operate a vehicle or machinery? (k) Any other serious medical problem that makes them unable to safely operate a vehicle or machinery? (2) Should the rule state that pilots who have failed a medical examination by the FAA be prohibited from claiming that they have no known medical deficiencies? (3) Should the rule state that pilots who have had their medical certificate revoked or suspended be prohibited from claiming that they have no known medical deficiencies? (4) Should the rule state that pilots who hold or have held a medical special issuance be prohibited from claiming that they have no known medical deficiencies? (5) What, if any, documentation should the FAA require persons without an airman medical certificate to execute in order to identify that they have evaluated their medical fitness to fly and that, to the best of their knowledge and belief, they are medically qualified to pilot an aircraft? How often (before each flight, annually)? What kind of documentation? (6) How, if at all, should the FAA require pilots without a medical certificate to disclose to passengers that they have not been medically certificated by the FAA? The FAA recognizes that broad scale medical self-evaluation could create substantial obstacles to the FAA's ability to enforce Sec. 61.53. Therefore, the FAA also requests comments on the following issues: (7) How would the FAA enforce and monitor compliance with Sec. 61.53(b)? (8) Should pilots who do not hold medical certificates be obligated to provide the FAA with their medical history/records upon request, either as part of a

specific investigation or randomly as part of a compliance program? (9) Should the FAA be able to require pilots who do not hold medical certificates to undergo medical testing when any uncertainty exists as to whether or not they have any medical problems? Under this proposal, pilots with an airplane, rotorcraft, or a glider rating and who elect to only exercise recreational pilot privileges would be eligible to conduct "recreational pilot" operations without having to hold or obtain a medical certificate. Therefore, a person's pilot certificate may represent apparent authority to conduct those operations even when that person may not be medically qualified under part 67 of this chapter. Under the current rule, these operations would require the pilots to hold and have in their possession a current medical certificate. Because of the possible enforcement problems associated with determining an individual's actual authority to operate, the FAA is also seeking comments on the following: (10) Should pilots who have known medical deficiencies be required to surrender their airman certificates? (11) If pilots are allowed to keep their airmen certificates when they have a known medical deficiency, should the FAA require the airmen certificates to be stamped "NOT VALID UNLESS ACCOMPANIED BY A CURRENT MEDICAL CERTIFICATE?" The FAA is strongly encouraging the public to express their concerns regarding these questions as well as any other issues pertinent to this proposal. The FAA requests comments on whether the limited operational scope of a recreational pilot certificate, under which all the above pilots would be required to operate, makes requiring these pilots to submit to medical examinations an unnecessarily burdensome process.

Comment NO: 1288	**User Name: dalswift**

Requirement for 3rd class for a private pilot is ridiculous.

Comment NO: 1296	**User Name: John Ross**

A driver's license is plenty. There's no showing that the Class III medical requirements (and onerous paperwork for exemptions, etc.) have ever contributed AT ALL to safety. The current situation encourages pilots to avoid seeing a doctors and prohibits certain treatments (e.g., depression). Is that what you want?

Comment NO: 1306	**User Name: RocketJoe79**

No Comment

Comment NO: 1309	**User Name: gyronutman**

I agree a current driver's license is all that is needed. I believe that an airman's medical certificate can be costly in time and in money. It makes it difficult to be able to fly.

Comment NO: 1310	**User Name: plnpliot**

because part 61 is verry important part of flying, a is ground school.

Comment NO: 1324	**User Name: MikeCleaver**

A self-declaration medical standard based on a motor vehicle driver's licence with certain added guidelines has worked well in other countries despite conventional aviation medical wisdom. While there have been a few medically-related accidents they have in general not involved non-participants because pilots who have not been able to hold a Class 2 medical have not flown over populous areas or carried passengers. Education to be responsible to others has worked and needs to be implemented - people who may pose an unacceptable risk flying larger aircraft with passengers over cities can still manage the risks by flying solo in lightweight aircraft over open country, and by only flying when they feel well enough and up to it. There have also been pilots who did hold a medical certificate who suffered sudden incapacitation - and food poisoning remains the greatest cause of in-flight incpacitation of aircrew.

Comment NO: 1329	**User Name: RTHOMPSON**

I strongly agree with this portion of the proposal. The actual physical exam for a third class medical does very little for safety and adds costs. If a person can safely drive a car, (which is more dangerous to other citizens), then that should be enough for light aircraft in a non comercial setting.

Comment NO: 1348	User Name: GeraldEmery

I think that this is the most significant portion of the whole process, and have always felt that the 3rd class medical was a farce and waste of money. The decision the drop this requirement is the first step in a great proposel.

Comment NO: 1353	User Name: sam

I'm in favor of the driver's license medical. I've had one Class III exam for pilot training and the exam was no more complex than listening to my heart and breathing, checking my weight and height and answering a medical questionnaire; and for that I got to pay a doctor $60. I drive over 45 miles to work one-way every day. I assure you, if I don't feel well enough to drive, I don't.

Comment NO: 1358	User Name: knight starr

yes I agree with this requirement. There are too many obstacles to flying today. This is one of them. I believe that a person who has it together to get to this point would not jeopardize himself or others by flying unhealthily any more than a driver would.

Comment NO: 1372	User Name: dhansen

Great idea!

Comment NO: 1383	User Name: wolfsdens

No Comment

Comment NO: 1407	User Name: humair14

I agree and I no longer hold a valid airman medical certificate. It will give me a chance to again utilize my piloting skills as I do hold a valid and current driver's license. I instruct now but only when the student is qualified as pilot in command.

Comment NO: 1418	User Name: RichJennings

I fully agree with this part of the proposal. When a person applies for a drivers license, certain minimal health requirements must be met to obtain the license. Eye sight is checked and a form is filled out to certify that the person is in suitable good health. A person could lie on a drivers licence form of course, but then they could also do that to an AME if the intent was to decive in order to pass. To a person, the pilots I know, would not fly while under health conditions that would hamper their facilities while flying. Thus the need to take yearly physicals in order to fly "simple" aircraft, is very unnecessary. I applaud FAA for their clear thinking in this area.

Comment NO: 1420	User Name: Ben

No Comment

Comment NO: 1436	User Name: buster

The drivers license medical proposal is the very heart of this NPRM. Without it, the entire effort will be a failure.

Comment NO: 1448	User Name: sleepy

I suspect that this proposal will be best accepted. I have had several GA pilots who have lost their medicals ask me about this aspect.

Comment NO: 1453	User Name: Marschner

The health concerns of the operator of a light aircraft is probably on par with the concerns of the operator of most automobiles. Therefore a similar level of monitoring probably makes sense.

Comment NO: 1455	User Name: jtriddle

THIS DRIVER'S LICENSE PROVISION IS AN ABSOLUTE NECESSITY TO PREVENT THE FAA'S AUTHORITARIAN ABUSE OF POWER. After 30+ years of not flying, I purchased a plane with the intent of getting back into sport flying. As I am in excellent health I did not expect any difficulty in getting a new Class 3. Last September(2001) I went to an AME for what I expected to

be a routine third class physical. I am taking a medication that is routinely prescribed for hypertension but I am taking it for a totally unrelated condition that is not an obstacle to safe flying and is not listed as an obstacle by the FAA. I do not have nor have I ever had hypertension, but my explanation and my primary care physician's statement to that effect has not been enough to convince the FAA that I am a safe and healthy pilot. Essentially they are calling both me and my doctor, liars. To get my 3rd class I have had to undergo a complete cardiovascular evaluation, including stress tests and wearing a Holter cardio monitor. Of course these tests are very time consuming and very expensive. I have passed these tests with flying colors, as I knew I would and my doctor knew I would. Here it is April 2002, 7 months later and I am still waiting on the FAA for approval which should never have been questioned in the first place. I am told that I will have to undergo this same expensive set of tests every 2 years if I am to continue to fly. The FAA has gotten too big for its britches and is stiffling sport flying. PLEASE ACCEPT THE DRIVER'S LICENSE PROVISION!

Comment NO: 1459	**User Name: llhoedl**

ACCEPT THE DRIVER'S LICENSE PROVISION, I also believe that if you are not flying for hire, You should be able to fly up to and including a light twin, as long as you have the rating.

Comment NO: 1466	**User Name: Parris**

Great advancement. We now are self licensed with our medicals. The sport pilot model would take it one step further. We now have to ask ourselves if we are able to drive a motorhome across the country safely, pilot or boat amoung crowded waters of the lake. I believe that most people will be diligent about the decisions concerning their welfare and the welfare of others. If not, the current license does not stop those who fly without a medical and have no regard for others.

Comment NO: 1482	**User Name: tuna**

The proposed medical requirement i.e. driver's license is at least a cursory proposal that still screens individuals as to their ability to see, and their physical ability to at least be able to drive a car. On one level this gives at least a minimal amount of data to obtain a Sport Pilot License. Additionally it eliminates other medical requirements that were too stringent for the type of flying that will generally be done under Sport Pilot. I am in favor.

Comment NO: 1496	**User Name: route6t6**

I think that since a current, valid drivers license is sufficient proof of being medically fit to operate a motor vehicle, then it follows that it should be sufficient proof of fitness for she sport pilot license. I think it is a good idea that will help promote General Aviation.

Comment NO: 1505	**User Name: divad**

A balanced approach to deal with the physical requirements of vfr pilots. Thank you.

Comment NO: 1511	**User Name: gyro jim**

No Comment

Comment NO: 1512	**User Name: gyro jim**

i agree to requiring a valad drivers license

Comment NO: 1517	**User Name: bjmoore**

Horah for this aspect of the rule. FAA's own data suggests that medical causes to accident is 1/4 of 1 percent of all general aviation accidents? Why the FAA doesn't apply this at least to the rec pilot certificate is not understood, nor logical.

Comment NO: 1530	**User Name: James Paul**

At last, some logic in who is qualified to fly simple aircraft. Let's face it, the most important thing we can do is look ourselves in the mirror and self certify that we are fit to fly.

Comment NO: 1538	User Name: Bill Bardin

This seems to be a helpful requirement for home-built and experimental pilots who have health troubles, but can still fly safely.

Comment NO: 1554	User Name: bliddel

The value of medical certification has been tremendously exaggerated over the last 40 years. As your own data clearly corroborate, pilots simply and generally do not have medically suicidal tendencies. Pilots must make the go/no-go decision every time they fly. Medical incapacitation accounts for almost zero accidents or fatalities. A significant number of medical factor accidents involved illegal (medically uncertified) pilots. Yet for many pilots today (myself among them) the cost of medical certification is always absurdly high (with all those ridiculous unnecessary special tests and exams and letters from doctors every single time, even for conditions previously reported many years ago and thoroughly reinvestigated every time since then). For me, it is the largest single related expense encountered from year to year. I've never been denied, just forced to pay and then pay some more and have it deferred to OKC again, and give more blood, get more letters written, have more x-rays, pay again, wait and be ignored, and wait ad nauseum, only to receive a back-dated certificate that is for about half the intended period. In spite of improvement in medical technology, the FAA is still forty years behind the times, treating medical certification as though it was some kind of leprosy-like legal liability to be avoided whenever possible. The FAA and all of its doctors can no more accurately predict medical sudden incapacitation than they can predict the stock market or the long-term weather. For all the millions spent annually on certification, less than one life is saved per year. Were those dollars diverted to more productive aviation safety uses, hundreds of lives might be spared every year. The Driver's license should suffice for anyone who is otherwise qualified to act as pilot in command of any aircraft with less energy transfer capability than your average rental truck fully loaded at maximum highway speeds. This could reasonably be limited to provision that operations are not conducted in Class B airspace, and that either #1, the PIC is solo, or #2 the one and only one additional passenger is informed before flight that the pilot does not possess an airman's medical certification. In other words, all two-seater operations outside Class B airspace should require only a valid driver's license for medical purposes. The senseless prohibiting substitution of a Driver's license for an airman's medical certification "if the person knows or has reason to know of any reason why he or she might not qualify for an airman medical certification" merely serves to bolster resentment against a risk-averse paranoid out-of-touch and unrealistic bureaucracy whose self interest is clearly not aligned with public safety. Such an exclusion serves as an inducement (to those who would much rather fly both safely and legally) to ignore absurd rules and/or to lie about it, just as so many pilots have avoided worthwhile medical treatments out of fear of unreasonable obstacles at the next medical certification encounter. Please drop this absurd exclusion. Allow a US State Driver's license to substitute for an airman's medical for any and all recreational pilot privileges, period, without exception. Also, consider allowing any two pilots who are otherwise qualified to fly together at dual control-equipped aircraft with NO airman medical certification for either of them. When was the last time you saw a light twin lose both engines simultaneously to a cause not related to a common fuel system? Simultaneous sudden-incapacitation of two specific humans for observable reasons that would affect certification is much less likely to occur than that!

Comment NO: 1566	User Name: ultraj51

yes I do agree-the real question is are you healthy prior to flight the day you fly-the pilot is the best juge of thatand this is the current rule in addition to a medical

Comment NO: 1591	User Name: harveyking

This is a positive proposal as there are alot of medical conditions which could discualify a pilot medical that are not serious in nature. I would believe that the current medical system in place should not be changed as it regulates commercial thru atr pilots. this makes the SP proposal a good alternative for the sport pilot.

Comment NO: 1598	User Name: davidbauch

No Comment

Comment NO: 1618	User Name: JSTO1

The current medical requirements are not reasonable and this approach is much more rational. If the current medical requirements were applied to automobiles, I suspect 80% of the current drivers would be disqualified. The automobile accident rates are hundreds or thousands of times greater then aviation incidents and cost impacts are billions every year. With the current technology and medical science there is no reason to keep the old rules for aircarft with less then 5 passengers or a family. Individuals who fly are aware that there is a risk involved. Having choosen to accept the risk they should not be restricted unless they demonstrate that they are not trustworthy, ex 2nd offense drunk drivers should lose both drivers and pilot license forever.

Comment NO: 1630	User Name: live2av8

NO, and yes. I can only justify requiring a DL if needed for identifying a perpetrator (law enforcement purposes), because DL's from most states double as a picture ID. Though this doesn't appear to be a concern of yours. ANY medical for recreational aviation relies upon an individual certifying themselves before any flight. A 3rd class medical or DL medical could be invalid even before it's completed. An Air Transport Pilot with a 1st class medical, could die of medical reasons within a few days of obtaining the medical. I understand that's actually happened, so truthfully, how valid are medicals when they depend so much on self-certification? It would be much more cost effective to require a Medical Declaration, and as history has proven wouldn't be any less safe to the participants or general public. I don't like the idea of, no valid DL, no flying. Example: if a person has 5 DWI's and understandably no DL, he/she wouldn't be allowed to fly. But getting such violations while driving a car is no guarantee they'll act as PIC of a flying machine while intoxicated. Additionally, there's already a law on the books which is suppose to prevent someone from drinking and flying with a blood alcohol concentration greater than .04%, which will apply to Sport Pilots as well. Another example: If a person receives numerous speeding tickets resulting in a suspension of their DL. I feel they still should be allowed to fly. If they bust the "speed limit" while flying they would be violating laws already on the books, under your jurisdiction. For brevity I'll refrain from citing all the other reasons I feel a DL medical isn't workable or needed. Asking pilots to sign a Medical Declaration will, in my opinion "cover yer butt", once completed you've done your job in trying to maintain safety in ultralight aviation. I don't feel a MD is needed for pilots of single place or single occupant fat/fast ultralights, except for flight over congested areas, even then merely to "cover yer butt". And I could see a MD requirement for pilots of 2-place machines with a passenger or another participant on board, like the current day UL instructors must do. Of course I make these statements in regards to what many refer to as ultralight class machines. I'm not to sure about pilots of machines with much higher kinetic energy levels than ultralights/microlights. Though I've rambled on, the answer to your medical query is within your own document. From page 5384 of your NPRM "The FAA believes that accident summary data from 1986 through 1992 indicating that the percentage of aviation accidents involving medical causal factors is lower for those activities that do not require medical certificates than for those activities that do." - and - "The FAA believes, therefore, that medical conditions are not a significant cause of accidents in aircraft that are used for sport and recreational purposes." - live2av8-

Comment NO: 1650	User Name: gyrochuck

I agree with the medical requirements. I feel if the person is able to drive a car that he (she) should be able to pilot a light sport aircraft. I maintain a third class medical but other than testing one's eyesight and hearing I think it's foolish to believe that the medical will guarantee nothing will happen to me while flying. Only I know if I'm capable of flying on a particular day.

Comment NO: 1654	User Name: TOMS

If you fee well enough to drive a car you should be able to fly a sport plane. I think using the drivers license data base to keep track of any DUI/DWI drivers would be an added advantage to keep drunks off the road and out of the air, even for the other classes of medicals. Speeding tickets or other infractions should not be dwelled upon.

Comment NO: 1671	User Name: nleggett

Hello, Please refer to my document FAA-2001-11133-231 for my detailed comments on the proposed medical requirement. I agree with the proposal to use a driver's license for the medical requirement. Thank you for proposing this approach to medical certification. Nickolaus E. Leggett, Private Pilot

Comment NO: 1678	User Name: john brady

Yes I do, I believe that this should work well for the category of aircraft and type of flying that most people would do.

Comment NO: 1693	User Name: flyingfree03

Yes, I strongly Agree with the D/L proposal. It is extremely important to Sport Pilot. Self certification has proved safe in other areas of flight such as gliders, ballons and ultralights. This proposal will work well in Sport Pilot with day VFR and the lower performance Sport planes. The cost and hassle savings over a class III medical is VERY important!

Comment NO: 1699	User Name: roycaton

The requirement for a valid drivers license is sufficient. Experience has shown that tiny percentage of accidents caused by medical problems happen to pilots with a current medical. I feel that there is no need for the 3rd class medical for private pilots flying general aviation now. e.g. SEL I can drive a 25,000 lb dump truck or a 10 passenger, 6000lb van on the highways at 70mph without a medical exam. Flying a light airplane (or other aircraft) should be no different.

Comment NO: 1719	User Name: bleddy

No Comment

Comment NO: 1734	User Name: evergreen

I agree with the proposal to accept either a valid medical or driver's license as sufficient evidence of medical qualification for VFR flight- it should be extended to all VFR flight IMHO. There will most likely be a slight increase in medical related accidents due to this rule in proportion to the increased number of pilots it allows to fly; however, the other limitations placed on what they can fly and where they can do it will limit the potnetial damage mostly to the individuals involved. The government (including the FAA) cannot protect all the people all the time, particularly not from themselves. In balance, the increased enjoyment (read that relaxation therapy) derived from exercising these privileges will more than offset the minimally increased risk to the public and may even reduce the medically related costs of the participants. In my opinion, the current FAA medical requirements are far more restrictive than need be compared to the risk involved in personal flight.

Comment NO: 1751	User Name: BigSkyAviation

I think that the sport pilot certificate should be scrapped in favor of the rec license. A rec license pilot without a class 3 medical should be able to fly a non-complex plane under day-VFR with a single passenger. This would follow the current system of a commercial rated pilot who's 2nd class medical lapses to a 3rd class can only exercise the priveleges of a private pilot. As that 3rd class medical expired the pilot would only be legal to fly as a rec pilot.

Comment NO: 1762	User Name: edburkhead

I think I would be adequately comfortable as a passenger in these circumstances. I know it's possible for a surprise heart attack, stroke or other problem to incapacitate anyone. ATPs with 1st class medicals sometimes die in the cockpit of airliners in flight. I think the driver's license is an adequate method of screening out drunks and chronically stupid, careless drivers. I'm certainly more threatened by them on the roads than in the air.It has long been my belief that the 3rd class medical, as it's now administered is more restrictive than needed for small two-place or one-place aircraft. (I do agree that the FAA Aeromedical Branch is MUCH more sensible now than they were 20 years ago.)

Comment NO: 1763	User Name: edburkhead

I've got 900+ hours as a pilot in command. I think I like the idea of make and model-category check-out for Sport Pilot privileges. It is something I would choose to do (and have done) in any airplane. I can see difficulties with the make and model checkout such as single-place plane check-out. What about when there's no instructor for a two-place within 300 miles? How are we going to handle these situations? How about models that are substantially identical. (i.e. a Cessna 150 vs. 152 or a Challenger II vs. Challenger II clip wing or very similar models of Quicksilver.)How about officially designating certain models a "similar" requiring no model checkout to transition between them?

Comment NO: 1781	User Name: fnad

I live in the Alaskan bush. Lots of folks don't have a driver's licence because there are no roads. An airman's medical exam is expensive and discriminatory. A drivers license is only an eye check. The medical would cost a trip to town ($500+) as well as the exam. Is driving a car in the city a prerequesite for flying an ultralight in the bush? Hello!!! At most there should be an eye check at the local clinic. ps. this is the slowest website in the world and I'm on long distance phone lines.

Comment NO: 1799	User Name: gldrboy

I strongly agree. Glider pilots have been self-certifying for many years without problems. A D/L is a reasonable standard. I would also ask this question: Who is safer to fly? A pilot who has had a triple-bypass, sees his cardiologist every six months and has a stress-echo exam every year, or a guy who eats hamburgers and french fries every day but who does not manifest any symptoms of trouble? The FAA won't let guy #1 fly, but guy #2 could be an airline pilot. I really think the FAA is way behind the ball on the current state of medicine, although this has improved in the last 15 years. In the final analysis, if we trust people to fly around the sky in machines then we have to expect them to be smart about when they are healthy enough to fly or not.

Comment NO: 1824	User Name: megamouse

Drivers license should be sufficient. 3rd class medical is a bit of overkill. Would like to see an alternative such as a general driver's license physical signed by a physician for people who don't drive, but who would just complete the physical and get it signed by a physician.

Question Number 4 - The FAA is proposing a make and model endorsement for a pilot exercising sport pilot privileges. The FAA believes that this requirement to acquire particular aircraft familiarization is appropriate for aircraft that are generally simple to operate, but that are not known to be designed to any widely accepted design standard. Do you believe this is appropriate? Why? Why not?

(4) The FAA is proposing a make and model endorsement for a pilot exercising sport pilot privileges. The FAA believes that this requirement to acquire particular aircraft familiarization is appropriate for aircraft that are generally simple to operate, but that are not known to be designed to any widely accepted design standard. Do you believe this is appropriate? Why? Why not?

Visited: 421	Total Comments: 150	Last Post: 5/6/02

Comment NO: 12 **User Name: Comperini**

Recreational and Private pilots have no such equivalent requirement. "make and model", is too specific. I would agree with a "category/class" endorsement.

Comment NO: 22 **User Name: delta2ul**

Make and model is entirely too restrictive. It would be a nightmare accumulating the necessary experience examiners. I suggest a category class system similiar to General Aviation: fixed wing land, flex wing land, parawing land, and the same categories in water. Also, the relatively high percentage of single seat aircraft makes the make/model system essentially unworkable. The prudent person will get a check ride in a 2 place version of the aircraft he desires to fly regardless.

Comment NO: 28 **User Name: DartHere**

There is more similarity between a Cosmos and an Air Creation weight-shift Ultralights, than there are between a basic 1956 Cessna 172 and a new Cessna with GPS and autopilot. If the aircraft are "generally simple to operate" Why are Sport Pilots required to have make and model training when Private Pilots are not?

Comment NO: 45 **User Name: capella1**

We are generally in favor of the make-model endorsement procedure as proposed, as we believe this process provides for a significant reduction in training costs and complexity to those that wish only to obtain the privilege of operating a specific aircraft. We also believe it would be difficult if not imposible to develop a simple training program that would address the diversity in operating characteristics exhibited by aircraft in this category, since these aircraft do not meet standard airworthiness design criteria. With the make-model endorsement process, training may be tailored to the individuals needs and the specific aircraft characteristics, without forcing a more complex training requirement on the applicant that would otherwise be necessary to address every non-standard aircraft that may be operated within a general type rating system. However, as proposed by FAA industry should work to develop "groupings" of aircraft that exhibit similar characteristics and allow for the operation of all aircraft within the group by the holder of an endorsement for any one of the listed aircraft. We believe this process appropriately addresses safety of flight issues for this diversity of aircraft while streamlining the endorsement process to appropriate levels.

Comment NO: 50 **User Name: RDavis**

Make and model endorsements are not required for Recreational or Private Pilot certificates in which the aircraft are more complex to operate than the proposed category. It is unnecessary to create a new airman certificate as modifications to the Recreational Pilot certificate to allow a drivers license medical would serve the same purpose without the additional regulation.

Comment NO: 65	User Name: flyfree

Do not need a make and model endorsement that's more restrictive than current GA regs. That's dumb.

Comment NO: 80	User Name: Bradley

I do not believe it is necessary to be endorsed for different types of PPCs.

Comment NO: 95	User Name: artspain

Make and model is too restrictive. I think category classes would be more appropriate.

Comment NO: 99	User Name: Bill Cartwright

I believe it should be category\ Class or Seaplane, taildragger, or tricycle gear as clasification. Taken into consideration the many styles will be quite alike in the Fixed Wing arena. Trikes and PPC are 2 other classes which would follow the same lines as the Fixed Wing.

Comment NO: 121	User Name: w1bfn

Until the industry comes to an agreement regarding performance and flight characteristics, this is probably the only safe and effective approach...However, please consider Make and series rather than make and model. Ex: Zenith 601, 601XL, 601HD, 601HDS, 601UL...They all fly the same, for all practical purposes.

Comment NO: 138	User Name: daberti

I think this is a prudent approach. In aviation safety is a learned behavior. I believe the "model" could be more generalized to encompass several models as one.

Comment NO: 155	User Name: barnesrc

Agree 100 percent!

Comment NO: 171	User Name: Ultraliteteacher

The make/model aspect is not viable, sensible, sane, or safe. On my field, I have 30 SP/ELAC prospects. Of those, there are 20 make/model combinations. I, being the instructor, must have 5 hours in each one prior to giving the required SP training to the flock. There is more risk to me, having to master so many variations of aircraft. There is little doubt that before I get my 5 in the planes, the owner/pilot himself would start off by showing ME how the plane flies. Afterwards, I am supposed to teach HIM? Even if I did have something useful to say during training, it would fall on deaf ears due to the lack of confidence that the student would have in my depth of experience. Remember, the student is the one that has a few hundred successful hours flying his machine. I'd have 5. To make matters worse, in this litigeous society that we have, I'd have to be put on his insurance waiver, and his plane onto mine even before we started talking shop. This would blow up into a disaster at each turn. Similarly, if the make/model strategy is so safe, why not use it throughout the FAR's. This simply would not be tolerated since the Category/Class system has proven simpler and successful. Given that, why go against a proven track record and mess the SP up with this nonsense.

Comment NO: 196	User Name: sthomason

No Comment

Comment NO: 210	User Name: Batson

This is a reasonable requirement given the type and compleity of the aircraft.

Comment NO: 221	User Name: capella1

Steamlining the make-model endorsement process by listing aircraft of similar characteristics and then allowing operation of all within a group if you hold any one of the listed make-models should eleviate the administrative burden for both pilots and instructors.

Comment NO: 241	User Name: Dennis

I agree.

Comment NO: 245	User Name: nleggett

Restrict the pilot by category of aircraft or perhaps to a set of specific sport aircraft. Require a make and model endorsement for flying a rented or club-owned light sport aircraft. Nick Leggett, Private Pilot

Comment NO: 249	User Name: E002SA

Absolutely not. In the weight-shift class for example, there really are few variations across the aircraft population even though there is no design standard. Further, the modular design of the aircraft with easily replaced wings makes the make and model matrix enormous. In my opinion, this class could easily be broken down into a few basic types: powered weight-shift/land, powered weight shift/sea, single surface wing, dual surface wing. Beyond these basic differences there is little variation, but note: a prospective weight-shift pilot would be required to earn two ratings, one for the wing and one for the undercarriage. This approach is more flexible than a specific make and model requirement.

Comment NO: 265	User Name: dalemseitzer

Some sort of specific training is needed--a 255 lb ultralight with top speed of 50 mph is very different from an 115 knot plane. Maybe groups of planes could be agreed upon such as 255 lbs to 330 lbs, 331 to 700 lbs. certainly an ultralight taildragger will handle similarily if they have similar power and weight. The pilots needs some sort of transition or introduction training.

Comment NO: 272	User Name: Barac

I believe a make and model endorsement is too restrictive. As a private pilot I can legally fly any SEL aircraft of less than 200hp just by jumping in and flying off. I wouldn't do that, nor would I think most prudent pilots. It doesn't make sense to require make and model on sport pilots. This requirement is imposed by insurance companies but on a lighter scale. I.e, I can't rent a new C172SP until I'm checked out in it with an instructor, but that check out covers me for any C172SP, C172R, 152, 150 that a company may be renting. This requirement would be essentially saying I have to fly with an instructor in each model aircraft. This would add much cost to flying, defeating the purpose of the LSA NPRM. Make endorsement category and speed based (PFW-land<75KIAS, PFW-land>76KIAS, PFW-sea<75KIAS, PFW-sea>76KIAS, PWS-land, PWS-sea, PPC-land, PPC-sea).

Comment NO: 297	User Name: deeph2o

I think this is a good idea for all GA pilots I think one should be certified individually on the first 3-5 aircraft before receiving a general license.

Comment NO: 309	User Name: woodg2

As a private pilot, a make and model sign off seems too restrictive. I licensed pilot should be required to get an endorsemento act as a sport pilot, but this should not be aircraft specific. For example, a pilot should be endorsed to fly a 3-axis control sport aircraft, but not be required to have an endorsemento fly a specific make/model. More than likely, the insurance companies will impose some sort of make/model specific training on a sport pilot - much like a private pilot getting a checkout in a Cessna 172. The private pilot license is enough to allow the pilot to legally operate the C-172, but the renter's insurance company requires the make/model checkout. The same type of logic should be applied to the sport pilot.

Comment NO: 314	User Name: SunKissed

an endorsement for any sport plane will foce the student to spend much more time and money to change from one plane to another. It might be difficult to find an instructor to sign off for a particular airplane that the student has already bought and wants to fly

Comment NO: 327	User Name: challengerpilot1

I totally disagree. Currently a private pilot can fly most any plane. There are some restrictions such as high performance. This make and model will greatly restrict the number of instructors avaiable. There are so many planes that a pilot may have to travel hundreds of miles to find an instructor with a plane like the one they have or want to fly.

Comment NO: 334	User Name: garyo

I believe Make and Model is rediculous. How are you going to get make and model in a single seat, let alone an instructor? Catagory, Class and or grouping of like types land and sea would be appropiate. Those who have succesfully flown this group of craft and can show log time should be signed off on that group of craft.

Comment NO: 378	User Name: wjwil

The general principles of flying are the same,but no two aircraft fly the same.A pilot certainly needs to be checked out in each type aircraft he flies.

Comment NO: 387	User Name: bobkat

Yes, the different categories requiring a sign-off for each is appropriate. A pilot should be properly checked out (with a sign-off) in each general category that he plans to fly.

Comment NO: 392	User Name: jwalters

Type rated is still type rated,sport pilot or not.

Comment NO: 414	User Name: ch900

I believe, generally, this requirement is far too stiff. A check out in type, yes. I do support the notion of more specific training, as this license is not as general or complex to receive, but practically speaking, I worry that this will also bring training to a grinding halt (as the pool of make/model aircraft available to trainers will be far less diverse than that available to pilots). This will require the student pilot to already own an aircraft, in which he or she can be trained, or will effectively reduce the number of manufacturers to very few. If this happens it will NOT be in the public interest. If this restrictive clause remains provision needs to be made for single seat aircraft. Lets generalize this into larger groups.

Comment NO: 433	User Name: hawkul

Completely unnessary and a waste of time and money. Type and catagory are good enough. Before any pilot jumps in a strange aircraft he will get enough advice from the owner of that aircraft anyway. Who is going to be doing all this instruction? The ultralight BFIs will not be sport pilot instructors due to unreasonable restrictions and costs.

Comment NO: 449	User Name: hawkdrvr

Unreasonable and unnessary. Type and category should be sufficient.

Comment NO: 463	User Name: creilly

No Comment

Comment NO: 469	User Name: Steve

I belive catagory and class would be sufficient. If one is transioning from tricycle to taildragger a ck out would be appropiate

Comment NO: 480	User Name: William G. macIntyre

The make and model endorsement should apply to pilots holding only a Sport Pilot licence, but not to experienced pilots now holding private or commercial licences, and flying under sport pilot privileges.

Comment NO: 484	User Name: kepfordj

It is appropariate for the sport pilots.

Comment NO: 494	User Name: W6KOW

As I understand it (from Sue Gardner), the proposal would not require make-and-model endorsement from private pilots who elect to fly LSAs within their category and class ratings. But I also question this for licensed sport pilots. Logbook endorsement for similar aircraft should be sufficient. Without out this change, fining a qualified instructor may be impossible.

Comment NO: 509	User Name: dmyhra

I believe that any pilot needs the endorsement in a new make and model, But if another make and model have the same design and flight operations, a compatablity list should cross approve the pilot.

Comment NO: 513	User Name: Taylorcraft078

I am coming at this from the point of view of a PP-ASEL that owns a taildragger. It is in general a good idea but may be carried too far for transitions such as Taylorcraft BC-12 to BC-12-D. Not a lot of difference there. The insurance companies will in general require more hours that required for an actual transition. I agree with the proposal in that a transition from a Taylorcraft to Luscombe to fat ultralight should require at least some transition training.

Comment NO: 525	User Name: lownslowav8r

As an ul instructor, I have done first flights on many unique aircraft without any problems. Please give us credit for being conservative and let us exercise our own best judgement as to when a specific type requirement is required, just as private pilots are granted the leeway!

Comment NO: 534	User Name: slowflyer

I partially agree. The reason is there are too many variations of ultralights for the 'make and model' part of the proposal to be realistic. There are many sizes of trike wings and wingspans of fixed-wings that will make flight characteristics similar but not enough to for check rides of these types. Transitioning between fixed-wing, trikes, and powered parachutes (ppc's) WILL be very necessary for ALL pilots certificated or not.

Comment NO: 539	User Name: steve.stefanic

Make & model is too restrictive. Category & class is sufficient. If you use make & model, what about the single seaters which many of us may still fly?

Comment NO: 541	User Name: 584241

A "type" endorsement, rather than a "model" endorsement would be more practical. Many instructors have hundreds of hours in a particular "model", but no experience in the hundreds of other models out there. As an example, I would be hard pressed to find an examiner for my airplane which is SN 008 of the 12 that have been built. The factory is in Florida and I am in California.

Comment NO: 548	User Name: dpurdy

Why would you want me as a private pilot with hundreds of hours in several makes and models that fit into the sport class find an instructor to sign my log book for each model after all these years? It was not reguired for my private pilot. Would it not be better to just grandfather them in? All certified aircraft that fit the sport class built since the 40's are of a widely accepted design standard.

Comment NO: 566	User Name: stewart

I believe type and category are enough.

Comment NO: 581	User Name: aeromac

I disagree. It would be difficult to find an instructor for a specific model, to say the least. The instructors are what the rule is based on. Let them do what they are certified for, use their best judgement.

Comment NO: 582	User Name: goluscombe

I feel this is good way to ensure pilot competency for make and model. As I understand it, a sport pilot does not need training IN the exact make and model of aircraft but he would require training FOR the make and model of aircraft. This means an instructor can "sign off" on many different aircraft he or she feels appropriate while training in only one model. s

Comment NO: 611	User Name: cec1155

I agree, the pilot should be familiar with the equipment he operates.

Comment NO: 638	User Name: jwg

I agree, but I fear this may turn out to one area with some problems when it comes to practical application. In principle it is an excellent idea, given the likely diversity of aircraft in the general category of 'sport plane', and the potential for a lot of new pilots with low time. At times it will be hard to find an instructor, or opportunity to do the familiaization. None-the-less I support this part of the proposal, while believing that some fine tuning may be necessary eventually.

Comment NO: 644	User Name: towpilot

I believe this is regulatory overkill to go as far as "make and model". I think a "class" rating would be appropriate, i.e. "3-axis control", "weight shift" and "powered parachute" as each of these classes has unique and markedly different handling characteristics, but within these classes a trike is a trike is a trike, etc. This is not required now for certificated aircraft and a Private Pilot SEL trained in an Aeronca Champ or a Cessna 152 is authorized to fly a stock Stearman without an endorsement, even though he is probably less qualified to do so than a Sport pilot transitioning from one 3-axis control ultralight to another. Except for those pilots who are prime candidates for Natural Selection, there will be check-outs in all new aircraft anyway.

Comment NO: 651	User Name: Triplek45

I disagree.There won't be enough instructors! You have to remember that the average student pilot doesn't have UNLIMITED TAXPAYER FUNDS to travel around over the country looking for a make and model instructor.

Comment NO: 653	User Name: glaunt

Perfectly appropriate. So many different configurations, some with unique characteristics.

Comment NO: 675	User Name: Flyguy958

This limitation will not be a burden and help with regular training to add additional aircraft.

Comment NO: 677	User Name: capella1

To clarify our previous comment, We do not believe you can develope a single "catch all" training program for a general type rating system unless all aircraft within the category class and type rating exhibit a single standard of airworthiness stability and control. Any attempt to develop a generic type rating for such a diverse category of non-standard aircraft will result in a much more complex and burdensome training requirement, especially for those that only wish to obtain the privilege to operate a specific aircraft, and would likely never address all of the diverse characteristics exhibited by aircraft in this category that a Sport Pilot may encounter. Grouping aircraft with similar characteristics under a single make-model endorsement program will address both sides of this issue and keep the basic training program simple. 1) Allow manufacturers to list all of their models that can be operated under a single endorsement within their training manuals to be issued to instructors. 2) Develop groupings of various makes & models that exhibit similar characterisitics and allow the operation of any aircraft listed within a group by the holder of an endorsement for any one of the listed aircraft. 3) Allow Sport Pilot instructors to issue endorsements under this concept. 4) Market demand will dictate sufficient administration of the endorsement process. Problem solved. This endorsement process should apply to Private Pilots excercising Sport Pilot privileges as well as many aircraft in this category exhibit significantly different characteristics of inertia, drag, stability, handling, and control than heavier aircraft certified in the standard category.

Comment NO: 690	User Name: radfordc

A person with a 1000 hrs in a Bonanza should not just step into an ultralight type aircraft without some checkout; neither should a Quicksilver pilot step up a Cub without training. But, to require a "make and model" endorsement for every different plane is overkill. Groups of similar type planes should be established and an endorsement for the "group" is sufficient. If instructors are required to have 5 hrs of experience in every difference make and model, the number of instructors available will be severely restricted.

Comment NO: 692	User Name: capella1

PS: If you are not going to incorporate the make-model endorsement concept, then all aircraft will have to meet a single standard of stability, control, ergonomics, etc. Without Make-Model, you might as well not put the Sport Pilot program in place at all, remove the medical from and make everybody get a Recreational Pilot Certificate, certify all aircraft to the same standard as currently exist, and leave the rules the way they are now. The Make-Model endorsement process is the core component of Sport Pilot. Without Make-Model, there is no choice or diversity and therefore no reason for Sport Pilot.

Comment NO: 708	User Name: Steve

Agree this is a good idea while most could go from cubs to champs to taylorcrafts. when you start adding stuf like weight shift and powered parachutes trikes some instruction would be in order.

Comment NO: 722	User Name: Wayne McIntosh

I disagree, these planes are supposed to be simple to operate safely. Many of them will be single seat aircraft. If you can fly a Quicksilver MXL II Sport why would you need to get instruction in a Quicksilver MXL II Sprint? You already have the below 87 knot rule and the grouping should be more general. By doing this the FAA is making it harder to find an instructor to teach you to fly. It should be more general like Tailwheel/tractor/seaplane or Tricycle/pusher/land.

Comment NO: 727	User Name: FlyDiver

5 hours in each make and model is massive overkill. 5 hours in weight shift trikes, 5 in powered parachutes, ect. should do nicely. If I am wrong then why is this rule not being proposed for GA aircraft which are significantly more complicated flying machines?

Comment NO: 732	User Name: Frank Beagle

A perfect example of using the FAA's own rule in effect today is the fact that a "tail-wheel" checkout is mandated. Now once having that "checkout" let's say in a J-3, then no other checkout is required to fly a Pitt's S-2, Stearman etc. until you cross the "High performance" line. If it's fixed wing, regardless of make and model, using your own logic, you should be allowed to fly any other LSP fixed wing aircraft. Now going to variable cg (weight shift) and PPC, checkouts should be enforced.

Comment NO: 752	User Name: jrhorsley

yes, i think you should get an endorsement to show you are familiar with the make and model plane you intend to fly.though models are similar they aren't identical in every way

Comment NO: 761	User Name: mccoy3

Yes, but reasonable grouping of similar makes and models should be grouped for reasons of cost effectiveness. This is an element that could make the proposal useless if held to as strictly as published.

Comment NO: 770	User Name: Rich Wallin

An exterianced pilot may be able to read the operators's manual and safely go from a Pacer to a Cessna 150, but a sport pilot with 20 to 40 hours could not make that transition safely. I think a sport pilot should be required to take a check ride with an instructor when he or she changes planes.

Comment NO: 790	User Name: airgus

While I support training and familiarization time with an instructor in general when changing aircraft, I think the make and model plan is too tight and should use broader categories.

Comment NO: 803	User Name: flightconn

As a private pilot, (500+ hours)I find it crazy that I should have to have an endorsement to fly a plane that I have over 200 hours in if I should choose to fly under the Sport Pilot license. The only difference between my flying with my private vs. Sport Pilot is the medical. Should I choose to fly with a Drivers License as a medical rather than a 3rd class medical, why does that mean I am no longer qualified to determine which aircraft I am qualifed to fly. I can make that decision on my own now, but as a Sprot Pilot someone else makes that decision for me - I don't agree.

Comment NO: 814	User Name: tebrahim

the make/model endorsement as it stands is not practical in the real world,does the FAA really believe that a person could find an instructor for EVERY make/model within a reasonable distance of their hometown. The proposal already has the 115 & 87 knot endorsement,could extend it to taildragger & maybe tractor/pusher configaration endorsement.I agree that the trike,powered parachute should be a saparate endorsement,but again don't think a make/model endorsement is necessary

Comment NO: 821	User Name: sam

I think it is wise to have someone at least evaluate you in a new aircraft, but I don't believe that you need five hours of instruction in every make and model. Flying an airplane is like driving a car; once you learn the fundamentals of flying a tricycle gear plane safely, they never change no matter what trike you fly. Once you learn the fundamentals of flying a weight-shift aircraft safely, they never change. Techniques and certain procedures may vary, but the fundamentals will always be the same. Keep it simple; I'm convinced that that was the original intent of this proposal.

Comment NO: 822	User Name: hiflyer

As a powered parachute pilot and instructor, I can only speak to that type. Most powered parachutes are nearly indistinguishable by make and model. That is not to say there are no differences. Perhaps a more meaningful differentiation may be chute type (square, hybred, eliptical), size or single place vs. 2-place, power/weight ratio.

Comment NO: 823	User Name: hiflyer

As a powered parachute pilot and instructor, I can only speak to that type. Most powered parachutes are nearly indistinguishable by make and model. That is not to say there are no differences. Perhaps a more meaningful differentiation may be chute type (square, hybred, eliptical), size or single place vs. 2-place, power/weight ratio.

Comment NO: 828	User Name: gkrug

This is sensible. I have 500+ hours in taildraggers, thru complex and floatplanes. However, when I went to a single place ultralight my experience and background held me in good stead due to the docile characteristics of these crafts. I would always seek instruction in more comples aircraft.

Comment NO: 848	User Name: johnckircher

DUH! The lack of a widely accepted design standard is what DEFINES experimental design. The very wording of this question is exactily the reason why the FAA should BUTT OUT! Trying to "save us from outselves" is what will kill innovation in this nation! I wonder if Orville and Wilber could have invented their aircraft with this concept restraining them.

Comment NO: 855	User Name: David Hodgson

There are to many different models to make this work. This needs to be type specific not model specific. I believe one could look at the various types and come up with a good typeing system that would be safe.

Comment NO: 871	User Name: windele

No Comment

Comment NO: 874	User Name: frjn33

The way this section is worded could spell trouble for anyone who wished to fly a rare or unique aircraft. No other aircraft of the same make/model might be available or reasonably available to train in. Keep it simple! "Taildragger" should be one category, not Fisher 202, Minimax, Ultrapup, etc. as separate aircraft to qualify in. Many "fat ultralights" which will end up being sport planes are only one-seaters. No instructor could go with the student in the qualification training. Make the familiarization in very broad categories and it will be both workable and helpful. Also, five hours instruction may or may not be warranted, depending on the category of aircraft for which one is already qualified and the one in which he or she seeks qualification. Please don't make this ponderously complicated!

Comment NO: 875	User Name: whiteman

I agree that some type of endorsement WRT to board catagories is necessary. But, it seems to me that model is too fine a graduation.

Comment NO: 886	User Name: Comperini

I agree with the entire concept of category and class endorsements, but do I not agree with the idea of make and model endorsements, which is found in many sections of the NPRM. Make and model endorsements are simply too restrictive, and will be completely impossible to adhere to, for both pilots and instructors. There are literally hundreds of "makes and models" of ultralights. Many manufacturers have different models of the same basic airplane. The Recreational and Private licenses do not require that a pilot receive an endorsement for each and every make and model of plane. In fact, in both categories, the Recreational and Private pilot can basically fly any airplane that fits within the limits of 14 CFR 61 for their class of license ("single engine land" for example). I recognize that different ultralights can have different flying characteristics, but the same is true in general aviation. I can also argue that many of the current amateur built airplanes also have very unique flying qualities. However, a private pilot can fly those aircraft with no additional training (as long as they fit the basic SEL definition). The bottom line is that pilots will always be responsible for deciding whether or not they should get additional training, before piloting an airplane in which they may not have adequate knowledge. No amount of regulation can ever prevent an irresponsible pilot from making poor decisions. A more suitable solution would be to adopt the category & class definitions used by the existing ultralight organizations (Land/Sea, Aerodynamic control/weight shift).

Comment NO: 893	User Name: Spdrflyr

My GA buddies ar more in tune with this one. I don't have enough knowledge to have an opinion one way or the other.

Comment NO: 900	User Name: tbrandt

Yes. This parallels glider launch methods. I see that individuals, organizations, plan/kit/ac creators could develop training checklists or training course outlines for the SP/LSA community. I know that APOA, EAA, and FAA publish such guides now for a number of areas.

Comment NO: 915	User Name: Gator

For what its worth, I disagree!! We need typing similar in design with whats already in place with GA. Conventional design (Cub, Tri-Pacer..)and Non-Conventional..That's it. Example-KitFox (Conventional)Quick Silver (Non-Conventional)

Comment NO: 930	User Name: lavasseur

The make and model certification seems completely unworkable to me. There are many makes and models without a second seat for training and checkrides. My personal experience in training for ultralight flying is that similar type aircraft such as taildraggers have similar characteristics. I flew three different taildraggers during training and did not have any particular difficulty with any. I believe it will be difficult enough to get training in a "type" environment as there are few if any instructors who will assemble a hanger full of planes or get training themslelves in "makes and models" which they don't own. On the subject of instructors, I have not heard a first or second hand account of one GA instructor who was willing to get into sport pilot training. They say, "forget it fo first class and get a private pilot ticket." This could dry up both sport pilot and ultralight instructiors in 36 months.

Comment NO: 945	User Name: Terry Davis

I agree that some sort of endorsement is a good idea, but it should be much broader than make and model. If a pilot had an aircraft that was "unpopular" how could he find an instructor to sign him off? Also, to restrict instructors to only a few, at most, models of aircraft would make it even harder for them to survive. An instructor will have a much harder life under this rule unless something is done to help him out. If the instructors "die out" there will be no sport pilots.

Comment NO: 953	User Name: SoccerPilot

I don't think this would help. Many ultralight are similar by design (Flightstar, Phantom, Hurricane,etc.). This would just cost me more time and money for little to no increase in safety.

Comment NO: 958	User Name: dfreeman

While the make and model endorsement requirement is probably in order for inexperienced sport pilots, I believe that at a certain level of experience, i.e. 50 or 100 hours of logged pilot in command time in a particular class of aircraft should be sufficient to preclude the requirement for make and model endorsement for every aircraft flown in a particular class. The requirement for current biennial flight reviews should be sufficient to maintain the required standards of operational safety. If there are safety concerns in the case of low total (less than 50 hours) pilot in command hours or less than 2 hours of logged pilot in command time in a particular class of aircraft in the preceding 180 days, then perhaps the regulations could require a “proficiency endorsement” from an instructor. Otherwise, the current requirements of the other ratings, for a minimum of 3 takeoffs and landings to a full stop in the preceding 90 days prior to the carrying of a passenger should provide the required currency and safety of operations. The fact that all the aircraft, be they factory manufactured or kits will be required to meet the yet to be determined “consensus standards” will bring them into compliance as “simple to operate” and the pilot operating handbooks should be somewhat standardized in the information provided and presented. This should also preclude the requirement for make and model endorsement in the same class of aircraft.

Comment NO: 983	User Name: kcmalls

Agree with qualifications. Why not do it by the same criteria used for GA? If a person is certified for airplane single engine land than it should be similar for light sport (ie airplane, weight shift, parachute and gyrocopter).

Comment NO: 1002	User Name: johnhenderson

Being familiar with an airplane is a smart thing to do. Even if I think I can fly something, It makes good sense to take advantage of someone elses experience to learn to fly safely. However, perhaps some aircraft can be grouped together so a general kind of aircraft can include more than one make and model similar to common type ratings for B757 and B767.

Comment NO: 1010	User Name: bampbs

I agree in general, but I would exempt aircraft with Standard Airworthiness Certificates.

Comment NO: 1018	User Name: Harold E. Thomas

This is agood idea and should be made a part of the program. Get a check out in any new airplane flown. I have observed this over the years and believe you can always learn some thing new about each plane when you check out in it.

Comment NO: 1034	**User Name: RFI**

I agree with this part of the NPRM. A pilot should be checked out in each type (make, model) of aircraft that he/she intends to fly just as is required of private pilots. The only problem with this requirement is: how does one get checked out in a single place aircraft?

Comment NO: 1047	**User Name: George**

The idea of checking out in a new aircraft is very good. However, if you have a "one off" example in your area how can you get a specific "make and model" sign off? I think regular CFIs should be able to sign you off in a similar aircraft or catagory of aircraft. Where would a CFI get the 5 hours to qualify in a "one off" for the area? I have a commercial license (1700+ logged hours) and have flown at least 8 different light planes. I think I could fly a SONEX or ZENAIR 601 XL with a reasonable checkout in, say, a Tiger or Chetta, signed off by a CFI.

Comment NO: 1053	**User Name: terryo**

To require that a pilot be examined in the make and model is NOT the best way to go, (some make are out of business etc..) a type IE: taildragger, high wing, low wing, open frame, gyroplane, float equiped should be OK.

Comment NO: 1080	**User Name: Gyroman**

I agree in general, but I would exempt aircraft with Standard and Experimental Airworthiness Certificates .

Comment NO: 1086	**User Name: Flymo**

Make and model alone will prove too restricting, particularly in the Gyro community where large families of similar gyros exist, and some 'models' have very short runs. A separation into categories (tractor, pusher, etc) would be more practical. To do otherwise invites flouting of the rules, and once this starts it can be hard to stop. Reasonable rules are good rules.

Comment NO: 1104	**User Name: fatplane**

There are already over 250 models in this category, which would require many, many two place trainers, which don't exist today. How are you going to assure that these trainers will be available before, say, the year 2015? Fat ultralight student pilots are already making their own way through the training syndrome with expert advice, provided by pilot friends, neighbors, etc. Let the market forces provide the solution to this one.

Comment NO: 1137	**User Name: 21214**

A Solo sign off from a CFI should be all that is required for any design of light aircraft. Any other requirement could cause abuse of the rules by FAA personell who might require "catagory and class" for an aircraft that has none (ie: experimental)

Comment NO: 1138	**User Name: rotopup**

Make and model is too restrictive. A more general endorsement might be appropriate.

Comment NO: 1170	**User Name: jonvee**

I think that you should acquire a certain number of hours of experience of an endorsement only if you want to carry passengers. Many two place aircraft, fixed wing or gyroplane, do not handle like the lighter single place machines. The lessons do not carry over well.

Comment NO: 1178	**User Name: heronium**

this will put too many co. out of bussness

Comment NO: 1183	**User Name: Bob L**

Without the inclusion of Gyroplanes this renders it impossible to fulfill this requirement for gyro pilots.

Comment NO: 1188	User Name: Russ King

That is too restrictive. How are gyroplane pilots supposed to legally transition into single seat machines. Keep it like general aviation requirements.

Comment NO: 1214	User Name: PWPlack

It is already difficult to pair up combinations of instructor and machine which meet experimental gyro training exemptions. This proposed change will make the odds astronomical. I'd suggest replacement with a requirement that a sport pilot have 5 hours logged in any make/model before carrying passengers.

Comment NO: 1222	User Name: helitim

If you are desirous of limiting your training to the minimum required then, you should also be willing to limit the aircraft you fly until properly trained in each one. A flight instructor would be highly tasked to be expected to be able to instruct a student to a level of proficiency to safely operate any aircraft falling under the guidelines in the nominal number of hours proposed therefore, limiting the pilot to make and model is the only logical approach.

Comment NO: 1249	User Name: pokey1652

Make and model check outs are probably excessive. Maybe only for pilots with less than 100 hours in that configuration, ie. weight shift control or powered parachute. With more experience, the make and model differences within a specific configuration sould not be that significant to the pilot. A single instructor should be able to give the instruction and sign off for a low time pilot on a new machine.

Comment NO: 1256	User Name: Dugaru

The make/model endorsement is unnecessary. A basic ASEL private pilot can legally operate an incredibly diverse array of aircraft, and there's no showing this freedom is unsafe. A sport pilot will face a much narrower range of aircraft types and performance. Further, the availability of instructors for make/model endorsements is unclear and unknown.

Comment NO: 1264	User Name: skiptyler

Certify by class/catagory should suffice.

Comment NO: 1271	User Name: James48843

Make/Model is not appropriate, as some sport aircraft, which were built but different individuals, would end up registered as different makes, but be otherwise identical, or, the converse, you may have the same makes and models listed in registry, with different flying characteristics. Suggest as an alternative, a limitation as to groupings of performance charactistics. Now that one will be hard to define!

Comment NO: 1282	User Name: fatplane

Quite a number of single place fat ultralights have no equivelant two-place trainer. How will the new owners of these sportplanes get a make and model endorsement?

Comment NO: 1289	User Name: dalswift

Appropriate for sport pilot category pilot. Superfluous for pilots with higher ratings.

Comment NO: 1297	User Name: John Ross

Many single place experimentals have no equivalent two-place trainer. How will the new owners of these sportplanes get a make and model endorsement? If it's a light sport a/c, let them fly it. Period.

Comment NO: 1314	User Name: lsippell

Keep it like general aviation requirements.

Comment NO: 1325	User Name: MikeCleaver

The proposal for make and model endorsements is gross overkill - but class and category endorsements make sense. If SEL is good enough for a general aviation pilot it is good enough for a sport pilot. If an aircraft is being hired out, the owner will in any case want to ensure that the person who hires it is able to operate it competently. Too many endorsements increases the paperwork with no safety benefit. design feature endorsements like tailwheel, or for unusual features, may be required but a log-book endorsement by an instructor would satisfy most safety needs. The certification of the aircraft would also serve to eliminate grossly unusual handling qualities. Weight-shift control (hang glider style) and billy-cart steering on trikes requires training, but not the bureaucracy of formally adding endorsements to the licence/certificate of the pilot.

Comment NO: 1330	User Name: RTHOMPSON

This is OK, but allow any pilot with a minimun of perhaps 50 hours in that type, endorse another pilot.

Comment NO: 1342	User Name: loeppert

I am a USUA BFI flying an Air Creation Trike. At my field there are 5 different wings, 4 chassis styles, and two engine models for a total possibility of 40 combinations of make and model. It is terribly inefficient to expect us to qualify in each make and model. We currently have the option to change the wings to suit our needs. Under the make and model rule, we would have to get an endorsement for the new combination. There is no difference in training required to safely fly these very similar craft. The rule should simply refer to class and category.

Comment NO: 1349	User Name: GeraldEmery

This could be a good idea if it were similar to the requirements of a private pilots requirements.

Comment NO: 1373	User Name: dhansen

This is not a good idea. It basically makes a greater restriction when operating under sport pilot than operating under any other rating. The person giving the endorsement probably will have less knowledge of a particular airframe that the applicant

Comment NO: 1384	User Name: wolfsdens

No Comment

Comment NO: 1394	User Name: JAMES LEIN

Not realistic. Needs to be changed to class and category endorsements. This also needs to be considered a minor change so that I live long enough to see Sport Pilot become a reality.

Comment NO: 1400	User Name: dschach

Make and model endorsements are not necessary for weight shift aircraft. There are too many wing and engine combinations to make this practical. There is less difference between trikes than between a c-152 and a c-172. Make and model endorsements will dilute the sport pilot instructor pool and slow the adoption of sport pilot.

Comment NO: 1408	User Name: humair14

Yes, I belive this is a standard that should be established for those new and different designs. This should not be a requirement for those well established aircraft designs that many of us have been flying for years.

Comment NO: 1426	User Name: biz451

For PPCs, this requirement is not generally appropriate, since PPCs *generally* share flight characteristics. The only area where such certification would be appropriate would be with wing types: rectangular (or semi-elliptical) versus elliptical. Rectangular and elliptical wings are different enought that separate certification is appropriate.

Comment NO: 1434	User Name: KendallDucote

Class endorsements would be more appropriate.

Comment NO: 1437	User Name: buster

I think this requirement is burdensome and overly restrictive.I beleive requiring a sportpilot to make at least 5 takeoffs and landings to a full stop solo before carrying a passenger would be adequate, especially if he holds a private or higher certificate.

Comment NO: 1449	User Name: sleepy

I think this is way to restrictive and maybe class endorsment would be the better way to go, especially as it pretains to PPC and weight shift craft.

Comment NO: 1450	User Name: sleepy

I think this is way to restrictive and maybe class endorsment would be the better way to go, especially as it pretains to PPC and weight shift craft.

Comment NO: 1454	User Name: Marschner

If the controls operate in a conventional manner as opposed to weight shift or controls in a rotor craft, I believe a class distintion would make sense, particularly in remote areas where it will be impossible to find an instructor with experience in the model to provide the endorsement.

Comment NO: 1460	User Name: llhoedl

I would like to see a check out requirement Like Single engine land. A requirement to acquire particular aircraft familiarization that is appropriate for aircraft.

Comment NO: 1461	User Name: llhoedl

I disagree in the aspect that the check out endorsement need only come from a person familiar with the aircraft.

Comment NO: 1464	User Name: Parris

Its common sense to become familiar with the airplane that you will be flying. Even today under the present system it is good judgment to familiarize yourself when flying a different airplane.

Comment NO: 1470	User Name: potentialpilot

This part is unenforceable and will shoot down the entire purpose of the NPRM. I favor having general type ratings plus an "ala carte" model covering significant features... for instance, you would be rated for powered fixed-wing aircraft, plus you could add on certification for retractable gear, adjustable props, flight over 115kts, etc. Thus a more complex or higher performance sport plane will still require the pilot to have training or experience with the features that may get them in trouble, while not requiring a hideous amount of effort to transition between broadly similar aircraft. Given that these aircraft will often be amateur-built, there will still be significant differences between several examples of the same make/model. If a design or feature is totally unique or is known to have, or may prove to have, unusual characteristics requiring special training, then perhaps that feature should be added to the "official" list of things that you have to get an add-on endorsement for. How far could that go, though... will a pilot have to get an endorsement when they install a new kind of instrument package? Keep it simple. If you encourage safety through common sense, you'll reach more people. Transition training for new types should be emphasized by instructors as a basic piloting skill, but it doesn't need to be law. Otherwise this is going to strangle the whole Sport Pilot program and cause the widespread, well-established types to be the only viable contenders. That just wouldn't be right.

Comment NO: 1518	User Name: bjmoore

This is one of the deal killers for the proposed rule. Although it's intent is for added safety, it is simply not needed in this rule for the simplistic machines that will be flown under it. It encumbers the rule with so much baggage, that it becomes an unattractive rule for instruction, aircraft ownership, maintenance ratings, and the overall viability of the rule. Take out make and model and consider class and category instead.

Comment NO: 1531	User Name: James Paul

No Comment

Comment NO: 1539	User Name: Bill Bardin

It is ridiculous. Why? Because I have been flying ultralights/ultralight trainers for over 14 years,with nearly 7,000 hours logged. The FAA writers have probably O hours. Most ultralights are extremely well-behaved, well-designed, regardless of any popularly accepted design standard. They are so well-designed that my general aviation students are amazed at how much better they perform than most general aviation aircraft.

Comment NO: 1547	User Name: creilly

It is just common sense.

Comment NO: 1561	User Name: LenSpencer

Here is where I have a possible disagreement. While I am a firm believer in having at least a thorough "cockpit checkout" in a particular model, if I have to actually go up with an instructor just to prove I can fly the thing, then the proposal as written virtually outlaws single-seaters.

Comment NO: 1567	User Name: ultraj51

YES this is exactly correct low time pilots more than others need and should have a check out.

Comment NO: 1571	User Name: bliddel

This is appropriate, but only to the extent that provisions are made for single seat aircraft, and for aircraft with maximum safe takeoff weights that do not allow a particular examiner of given weight on board with a particular pilot of a given weight. Furhtermore, this should not be a minefield for enforcement action. A checkout in a Cessna 150 should apply to all Two-seat Cessna's, be they 152H or a 150A. A checkout in a 152H should require only flap and slip limits familiarization to apply to a 150. A checkout in a C150 with an Icom handheld should not be a "different model" than one with a King radio or a different magneto or battery. Likewise for sport pilot aircraft: Make and model - should be liberally interpreted in favor of the pilot. Furthermore, medical certification aside, a private pilot flying a sport aircraft is or is not qualified - regardless of the manner in which the medical certification is achieved. The idea that a private pilot suddenly needs a checkout in Model 123c (high wing tricycle gear with flaps but no constant speed prop) only because he let his medical certificate expire - is absurd.

Comment NO: 1592	User Name: harveyking

The endorsments need to be by catagory as: Autogyro, they all are similer in flight charactristics. U/L type (70 mph max) LSP type hihger performance Weight shift Flex-wings are charactrised by wing manufacture, rather than airframe manufacture. The requirment of indvigual endorsment should fulfilled after a minimum number of hours in each catagory.

Comment NO: 1600	User Name: davidbauch

I do not believe it is necessary to have make and model endorsements for each different aircraft. For instance, we own two Powered Parachutes of different manufacturers, and the only significant difference is the method used for ground steering. Similar machines should be grouped together. It is also unnecessary to require separate endorsements for each similar wing of different makes. Many Trike and Powered Parachute owners have several wings.

Comment NO: 1619	User Name: JSTO1

Requiring an endorsement for each make and model is unreasonable since it adds cost and paperwork that has no significant value. I suggest using the existing classifications (ex. single engine land)plus major technology classes (ex. gyro, powered parachute, fixed wing etc,. There is little possibility that an examiner could become familiar with all the potential makes and models to be qualified to pass judgement on them. So don't waste time and money of both individuals and government creating something that doesn't have value added. It would be reasonable for the operator to document 10-20 hours in a category before taking passengers. But a logbook entry by the pilot should be sufficient within a category. Splitting the categories by technology would be reasonable, autogyros, vs fixed wing, or powered parachutes have enough uniqueness to justify demonstration of capability at the category level. Make and model are unnecessary and unreasonable.

Comment NO: 1631	User Name: live2av8

NO, there are too many variations to make a design standard feasible or workable. Most instructors who would be expected to give the M & M endorsement wouldn't be qualified (5 hrs. in M&M). It would be better to ensure that instructors emphasize/reemphasize to pilots during initial instruction (student) or a checkout (current FAA pilot), the importance of becoming familiar with the machine they're about to fly. Done properly category and class endorsements would suffice, as performed now in the world of ultralighting. -live2av8-

Comment NO: 1669	User Name: Ultraliteteacher

I disagree with the make/model proposal. If this concept was better than category/class, then it would be reasonable to apply this rule throughout all aviation. Fact is, it has not demonstrated itself to be appropriate anywhere else. It should be reverted to category/class. Category should be expanded to include parachute, gyrocopter, weight shift, light plane (<1232 or whatever), standard plane (<12000), and heavy plane. All with and without one engine or multi engines. For class: with wheels, floats, or feet.

Comment NO: 1679	User Name: john brady

I don't feel that we need to do this by a specific make/model. I believe we should be able to do this as the private pilot certificate reads-single engine land, with endorsements-taildragger or floats, etc. Let's keep this simple without compromising safety. Remember we are going thru this whole process to jump start aviation and get the young people interested in aviation and try to keep our older pilots around to share their flying expertise. Also to mentor young people about having fun and encourage them to be safet pilots. This I'm sure can get done without compromising training and safety and still have fun and rewarding experience of aviation.

Comment NO: 1700	User Name: roycaton

A make and model checkout is entirely appropriate given the proposed rules for the LSA. A safe pilot would do this without the rule.

Comment NO: 1710	User Name: Pam

Powered parachute machines fall into 2 basic categories: 2-point attachment and 4-point attachment, this and the presence or absence of a rudder mechanism should be the basis of differentiation for PPCs

Comment NO: 1743	User Name: gyrochuck

I think make and model endorsements are too stringent. I feel classes of similar aircraft to be more appropiate. I endorse EAA's reasons and modification to this section of the proposal.

Comment NO: 1753	User Name: BigSkyAviation

Under the current part 91 / part 61 rules a single engine plane is a single engine plane. The only difference is taildragger vs nosewheel. And float vs wheels. Why is make / model required? People are not stupid. They will get sufficient training in their expensive plane before they attempt to fly it - if that training is available. Under the 103 exemption it is. If sport pilot is enacted I forsee less training opportunities.

Comment NO: 1764	User Name: edburkhead

I've got 900+ hours as a pilot in command. I think I like the idea of make and model-category check-out for Sport Pilot privileges. It is something I would choose to do (and have done) in any airplane. I can see difficulties with the make and model checkout such as single-place plane check-out. What about when there's no instructor for a two-place within 300 miles? How are we going to handle these situations? How about models that are substantially identical. (i.e. a Cessna 150 vs. 152 or a Challenger II vs. Challenger II clip wing or very similar models of Quicksilver.)How about officially designating certain models a "similar" requiring no model checkout to transition between them?

Comment NO: 1778	User Name: flylite447

Make and model endorsement would work only if 1) There are a very few makes and models or 2) Instructors are very abundant. Otherwise, it will be very difficult to find an instructor who could provide a pilot with make and model endorsement. Please realize that sport pilots will not be as mobile as other pilots. Their planes are poorly suited for transportation. Traveling long distances for make and model endorsement would limit the potential pilot population considerably.

Comment NO: 1782	User Name: fnad

I am the only PPC BFI in western Alaska and have a Buckeye, and you are saying that if someone gets a Six-chuter or Infinity I can't instruct on that and they need to travel 3000 miles to the nearest instructor? If you have to control what goes on, limit that to category and class. You would make it impossible for improvements to arrive.

Comment NO: 1800	User Name: gldrboy

I support this proposal. But it should be completely within the instructor's perogative--it is very reasonable for an instructor to sign off a high time, current pilot with just a briefing. In the glider world, where most aircraft are single seat, an instructor's briefing is all you can do and it is very helpful for low-time pilots. So yes, require make and model, but make it simple and easy to administrate. Insurance companies require this now anyway.

Comment NO: 1825	User Name: megamouse

Make and model endorsements are uneccessary. Better to require 2 hours flight time as soul manipulator of controls, prior to carrying passengers. Instructor endorsements should be limited to floats, tailwheel, etc.

Question Number 5 - The FAA is proposing that the three exemptions issued for training under 14 CFR part 103 be rescinded 3 years after the effective date of the final rule. The FAA believes that this training (for compensation or hire) should be conducted with aircraft meeting the requirements of a special, light-sport category aircraft airworthiness certificate. Also, the FAA believes 3 years is sufficient for instructors conducting that training to obtain a flight instructor certificate with a sport pilot rating. Do you believe that rescinding the exemptions after 3 years is appropriate? If not, why not?

(5) The FAA is proposing that the three exemptions issued for training under 14 CFR part 103 be rescinded 3 years after the effective date of the final rule. The FAA believes that this training (for compensation or hire) should be conducted with aircraft meeting the requirements of a special, light-sport category aircraft airworthiness certificate. Also, the FAA believes 3 years is sufficient for instructors conducting that training to obtain a flight instructor certificate with a sport pilot rating. Do you believe that rescinding the exemptions after 3 years is appropriate? If not, why not?

Visited: 430	Total Comments: 129	Last Post: 5/6/02

Comment NO: 23 **User Name: delta2ul**

I believe the FAA should allow training for hire in Experimental Light Sport aircraft, FOR PART 103 STUDENT PILOTS ONLY. This program could be administered by the existing exemption holders. The instructor would have to be a certificated Light Sport Pilot, the aircraft would have to be a registered Light Sport aircraft, but instructional training and registration would be done by the current exemption holders as is done presently. This will allow training for hire for training Part 103 pilots and eliminate the two seat, flying for fun, loophole.

Comment NO: 30 **User Name: DartHere**

Why is it necessary to rescind it at all? The two-place exemption and the BFI exemption should be made a permanent FAR. This method has worked for the last twenty years and will continue to work in the future. While the NPRM may meet the needs of Private Pilots who have lost their medical it does nothing to improve those wishing to fly under part 103. The FAA states that it does not want to perpetuate "rulemaking by exemption" (5397 Analysis of Alternatives), yet on December 20, 2001 the FAA granted the EAA an exemption allowing compensation for training while using Experimental aircraft (Exemption # 7162B). If the FAA wanted to change this method of rule making they have not shown it so far. Further, the expiration if it is to take place should take place thirty-six months AFTER the FAA approves a "Consensus Standard". The NPRM assumes that a consensus standard can be reached during the next 12 months, but what if it takes 24 months or 30 months, or for that matter if it is never reached. How can Pilots and manufactures make plans if the time between approval and the requirement of the standard is too short? This may sound absurd, but how long did it take the ARAC and the FAA to reach the point that we are today, 9, 10, 11, years?

Comment NO: 51 **User Name: RDavis**

The exemptions should be made a permanent SFAR, and the organizations holding the current exemption should be made more heavily accountable for compliance. The current ultralight training system has worked over the past 20 years to enhance the safety of Part 103 operation.

Comment NO: 63 **User Name: rjpetit**

There doesn't seem to be much incentive for a BFI/UFI to become a Sport Pilot CFI. Many ultralight instructors do not want to tranistion. If too few instructors transition to Sport Pilot CFI

sport pilot will die and FAR 103 safety will drop as well. Why not just make the exemption a rule. It seems to work well as is. It can coexist with Sport Pilot.

Comment NO: 66	**User Name: flyfree**

If you're going to have Sport Pilot, the UL training exemption has to be tossed. It would be like having 2 different possible drivers licenses for the same car with no reason for it.

Comment NO: 81	**User Name: Bradley**

The FAR 103 will work fine with a little modification. Wholesale replacement with something unproven and more costly is not the answer.

Comment NO: 96	**User Name: artspain**

No Comment

Comment NO: 104	**User Name: Bill Cartwright**

I do not agree with this approach and I believe the Ultralight training program has been deleted in an approach to eliminate those who fly without training. I agree with this but throwing out the baby with the wash water is not the answer. BFI's with 500 hours should be left with the exemption to protect the public from self training of Ultralight flight. I would hate to be respondsible for the deaths to come because of a foolish rule.

Comment NO: 122	**User Name: w1bfn**

No Comment

Comment NO: 139	**User Name: daberti**

No Comment

Comment NO: 156	**User Name: barnesrc**

No Comment

Comment NO: 172	**User Name: Ultraliteteacher**

This is the most disasterous aspect of the NPRM. You start with a system that has a superior safety rating compared to GA flight, then propose a untested policy and destroy the mechanics that are in place and safe??? This flies in the face of safety. Destroy the proven for the unknown. This is intolerable. If the FAA is intent on destroying the exemptions due to them being exemptions, simply codify them into the SFAR and go with it. It is proven operational for training. If the FAA is intent on destroying the exemptions for control, simply put them into the SFAR's. Assign N numbers to the so called fat UL's. Assign solo tickets for fat UL's based entirely on filling out a form. Done, you are now in control. You now have N number accountability and rescindability. If safety is your mandate, then do not traumatize the system by removing the only coherent instructional force that you have! Ever! Quite the opposite, the FAA should be attempting to have EVERYBODY possible become an instructor. There is an old addage amongst teachers. You will never really know a subject until you try to teach it.

Comment NO: 211	**User Name: Batson**

This is a very fair time frame and gives all affected instructors a wide window to comply.

Comment NO: 250	**User Name: E002SA**

There are a few problems here. Because people with be trained in special light sport aircraft, which are likely to be both more expensive and more generic than the experimental LSA the average pilot is likely to be flying. Don’t forget, the current fleet of ultralights, fat ultralights and trainers is likely to continue in service for many years. At the heart of the ultralight community is truly affordable aviation. Ultralights costing $5,000 to $15,000 have served to bring many people to aviation that could otherwise never afford to do so. Adding $5,000 to the price due to the increased cost of the aircraft combined with requirements for additional equipment would preclude a great many of these people, and will likely force out many current pilots. The same is true for instructors. Even though there may be little actual difference in the aircraft they fly, the increased cost of certification and maintenance means it is likely that 75% of current instructors

will not be instructors under sport pilot. In a few cases this is probably good, but overall, this would be bad for the community, especially so for the pilot wishing to fly true FAR 103 aircraft who now may have no access to instructors. A compromise between sport pilot and the exemption system may be in order. Require the instructors and examiners to be FAA certified, but allow them to give compensated training in the existing trainer fleet, or in experimental LSA (same thing). Instruction in experimental LSA would be subject to additional limitations such as no congested areas, no class B or C airports, etc., much the same as the current trainer fleet is limited. This would ensure that pilots of FAR 103 and experimental LSA would continue to be able to receive training in craft that was actually similar or the same as what they would themselves be flying, and would have a much smaller impact on the current instructor population.

Comment NO: 258	User Name: nleggett

Anyone training new students should be highly skilled as a pilot. New students can easily do sudden, strange, and dangerous things that the instructor must correct quickly to protect their lives. Keep high standards for instructors. Nick Leggett, Private Pilot

Comment NO: 261	User Name: capella1

No Comment

Comment NO: 266	User Name: dalemseitzer

I disagree because I have not seen GA CFI's being willing or interested in providing the training--they don't like ultralights. FBO's would not be willing to purchase another plane which would be used only for sport pilot training. As a BFI with ASC, I would not be willing to buy a manufactured plane for a very part time avocation. I expect to lose money each year. For the current proposal to work, the instructors would have to charge 2-3 times what GA CFI's charge to make up for the limited time available to teach due to weather. So even though fewer hours would be required, the student would need to pay more per hour to make up the difference. Let current BFI's teach with a little additional training and keep the current safe ultralight trainers. The FAA could enforce the exemption and weed out those who really do not want to teach. I went through alot of additional flight and ground training to be a BFI and I had almost 2 hour check ride with 6 engine outs --2 in fields and 4 from different points in the pattern--I worked hard to get my BFI. How many GA pilots, when they are doing their run ups notice a rough running engine--the procedure is to lock the brakes and run it up to burn off the spark plugs. An ultralight pilot in the same situation would not take off! We would go back remove the spark plugs, clean and regap them or replace them. Our planes are safe and we fly safely.

Comment NO: 276	User Name: Barac

Since Part 103 will be left unchanged, a instruction method must remain for these Part 103 pilots to be trained. In most cases, those staying in Part 103, are doing so to avoiding coming under regulation by the FAA. They should be provided a training method that too, is independant of the FAA, and self regulated, just as it currently is. I also believe that a provision should be made to allow currently existing, factory built aircraft that would meet the eventual consensus standards, to be accepted under the Special-LSA airworthiness certification.

Comment NO: 299	User Name: deeph2o

I think a graduated program should be in effect for every type of license...I am still against the sport license.

Comment NO: 331	User Name: Joe G

How could FAA believe that any future CFI is interested in investing money in a special light-sport aircraft that would meet both FAA certification requirements and student needs for safely soloing a Part 103 legal ultralight vehicle?

Comment NO: 336	User Name: garyo

OK. So where are these so called instructors to come from. I realize 2 seat ultralights flying friends not for instruction is bad and should be stopped. Yow will not do it by pulling the exemption and then requireing CFI ratings and certified LSA craft without compenstation. No one is going to do this or if they do it no one will be able to afford them. Instead you will have unexempted 2 seaters doing it without at least the knowledge of the "orgs". I think this is a unintended shot in the FAA's foot.

Comment NO: 395	User Name: jwalters

Come on guys, one of my former instructors taught me with himself barely a 100 hours over the minimum for CFI, Three years??????? The manufacturers making these a/c would all go bankrupt and destroy what is attempted to be accomplished here. The point is affordability!!!!!!!! without this the general aviation market is going to continue to get costlier while the FAA own reciepts are going to shrink, which means costs will get even higher.

Comment NO: 402	User Name: wjwil

No Comment

Comment NO: 419	User Name: ch900

I agree and disagree. The UL training programs are working well. Why change that? If a change is to be made, have the aircraft come under the sport pilot umbrella. But do NOT have the instructors become CFI's. The instructors are, by and in large, well trained for UL training. Most instructors do this part-time and many out of love. A CFI requirement will just remove the needed instructors from the pool. I like having the planes under the umbrella. Please rethink the CFI requirement.

Comment NO: 429	User Name: pat

while i agree with the 3 year limit for flight instructors i think that the 3 year limit on the airplane is going to cause a lot of problems. i would propose the following: allow 3 years for the manufactor of any current aircraft that is being used under the exemption to certify that the plane was manufactered to the indrustry standard. (basicly grandfather all current aircraft if they are maintained as airworthy).

Comment NO: 434	User Name: hawkul

Neither CFIs or BFIs are going to invest in a special LSA for instruction. The FAA needs to look at the economics of this situation agian. It would be smarter to make the exemptions a permanent part of part 103 and penalise any organization that abuses them. At least that way you don't kill off the fastest growing section of recreational aviation.

Comment NO: 451	User Name: hawkdrvr

The exemptions should be incorporated into part 103 permanently.

Comment NO: 473	User Name: Steve

I agree. Three years anyone training should have a sport pilot flight inst certif. also aircraft should be maintained to a standard.

Comment NO: 481	User Name: William G. macIntyre

No Comment

Comment NO: 487	User Name: kepfordj

yes, it is enough time to bing them up to speed.

Comment NO: 514	User Name: Taylorcraft078

The proposed requirements for an instructor are so trivial that anyone qualified should be able to convert in 3 years with minimum expense.

Comment NO: 531	User Name: slowflyer

Ultralight flying has a proven safety record under the Part 103 BFI, AFI exemption. The problem arises where the exemption has been abused by pilots wanting to carry a passenger without training that person. This needs to be corrected BUT the SP is not the answer. Why? Because it will cost too much for the average BFI to make the transition and put most ultralight instructors out of business.

Comment NO: 542	User Name: 584241

No Comment

Comment NO: 567	User Name: stewart

I believe that very few real CFI's have any interest in ultrtalite aircraft. I believe the FAA should leave this alone, I bekieve that it is working satisfactorily right now. I also believe that placing new certification requirements on the training aircraft will kill the whole proposal. Keep safe, keep it simple, and for goodness sake, keep it FUN.

Comment NO: 583	User Name: aeromac

I disagree. Where is the incentive to get these SP instructors? If there aren't enough instructors to train sport pilots, the license is useless.

Comment NO: 585	User Name: goluscombe

I agree. This is not a burdensome language for a flight instructor. I feel that this aspect of the proposal serves to upgrade the quality of the fight instructor pool.

Comment NO: 602	User Name: radfordc

This is a bad idea in that you will be doing away with the training program that has made Part 103 so successful, with no assurance that the SP rules for training will be successful. The FAA expects that many current Part 103 instructors will move up to SP-CFI and continue to instruct. Given that a Special light-sport aircraft will cost 3-5 times more than current Part 103 ultralight trainer, this is not likely. Without a sufficient training base, many new Part 103 operators may choose to "self train" as they did in the early days of ultralight flying...with predictable bad results. The Part 103 training exemptions should be continued without a time limit until it is established that the SP program is indeed a success. Additionally, you should allow SP instruction in experiment light sport aircraft. The FAA already allows individuals to use experimental aircraft to conduct transition training. Why not allow SP inital training to be offered in Experimental LSA also?

Comment NO: 612	User Name: cec1155

I don't think it is appropriate. I don't think that many part 103 folks will move up.

Comment NO: 634	User Name: flychallenger

As an ultralight instructor, my first choice would be to leave the present system as is, and make it a permanent part of Part 103. If that option is not available, current instructors could be grandfathered into Sport Pilot CFIs. The problem I see is the instructor's plane. Most instructors will not go out and buy another factory-built plane to replace the one they are training in now. This will eliminate a large portion of the instructor base, resulting in the lack of instruction for new pilots, who might resort to teaching themselves to fly like they did before the exemptions were enacted. This will certainly raise the accident rate. I propose that the current trainers be grandfathered for as long as the current instructor owns it. Once sold, it would revert back to an LSA-exp. This would be a workable compromise between allowing kit-built trainers continue indefinately vs. cutting them off on a certain date. As time goes on, the current trainers will be replaced when they are worn out or sold.

Comment NO: 645	User Name: towpilot

This is a generous amount of time for compliance with all the rules covered by the 3 year exemption. There is a problem that I see in potential flight schools making any investments in CURRENT equipment without some assurance that what they buy will eventually qualify for an airworthiness certificate. I am seriously considering a $23,000 investment in a Moyes Dragonfly, to be used for both Sport Pilot basic training and hang glider tows. I doubt that I could amortize the cost over the exemption period, however, and the prospect of having to buy another aircraft in 3 years would pretty much put the kibash on my dream of a multi-faceted ultralight flight operation. For most commercial Sport pilot operations the margins will be pretty thin as it is and

the thought of having to buy another aircraft when the one you have isn't even paid for is going to throw a lot of cold water on commercial sport operations. There should be a provision that allows the certification of existing sport aircraft as long as they conform substantially to the one that finally gets the airworthiness certificate.

Comment NO: 654	**User Name: Triplek45**

I disagree. It is appropriate only if the FAA is trying to kill the only grass roots affordable entrance into aviation.

Comment NO: 655	**User Name: glaunt**

That should be plenty of time for the transition. It will be unfortunate for someone who has an airpalne that is just 37 months old.

Comment NO: 709	**User Name: Steve**

AGREE

Comment NO: 723	**User Name: Wayne McIntosh**

I think this is a real bad idea. Today I talked to two Ultralight instructors who are good active flight instructors. Both of them said that the Sport Pilot rule will cause them to quit instructing because of the cost of purchasing a new trainer. I am afraid this is going to be the rule and not the exception. They both said that there is not very much money to be made instructing in ultralights and that they do it because flying is their hobby and they like instructing others to fly. They also say that if the cost of learning to fly is to go down with the Sport Pilot proposal it will not happen if instructors must buy a new plane in 3 years. It also seems to me that if the exemptions all go away in 3 years and if ultralight instructors cease to exist the safety of flying ultralights will also be degraded. The FAA needs to change this rule to allow instruction in Experimental trainers for 10 years after the manufacturers actually start selling certified Sport Aircraft. That way the ultralight instructors will be able to train people to fly Sport Aircraft and in 10 years used certified trainers will become available to part time flight instructors who are the backbone of flight instruction in ultralights now.

Comment NO: 728	**User Name: FlyDiver**

If SP does not meet its goal of providing qualified SCFIs, nothing will be left to legally provide training for part 103 vehicle owners who will in turn be in exactly the same situation they were in before the exemptions. Current BFIs fall into 3 categories: 1. Those who only became a BFI to legally fly a 2 seat trainer (perhaps the majority); 2. Part time active instructors (the majority of active instructors); 3. Full time instructors (useually also dealers or manufacturers). The majority of category 1 BFIs will probably certify their trainers as experimental and quit instructing. The majority of category 2 BFIs will do the same if they are required to buy new SLSAs at the end of the 36 month phase in period. That leaves a hand full of dealers/BFIs remaining as instructors.

Comment NO: 745	**User Name: kbruno65**

I believe that the three year period is adequate enough for instructors wishing to continue training as Sport Pilot Instructors. However, I think that it a bad move to disqualify their current airplanes now certified under part 103 training exemptions. For example, I'm considering pursing my USUA BFI certification and will be able to use my 2-place ultralight for training for the first three years after Sport Pilot is in effect. However, after that, I will have to purchase a factory-built aircraft. I believe that current part-103 exempted aircraft should continue to be allowed to be used under the new Sport Pilot certification as long as they adhere to the same standards that factory-built airplanes conform to. To believe that current part 103 instructors are going to go out and purchase new airplanes after three years just so they can keep instructing is crazy. It won't happen. Part 103 instructors teach others because they love the sport and want new people to be exposed to it. They don't do it to make money. I feel that if the Sport Pilot NPRM goes through as it is that after three years, the only people doing training will be the factories that build the Special Light-sport aircraft.

Comment NO: 755	User Name: jrhorsley

No Comment

Comment NO: 762	User Name: mccoy3

Three years is OK. I would prefer 5-years for a more natural shaking-out.

Comment NO: 771	User Name: Rich Wallin

No Comment

Comment NO: 772	User Name: Rich Wallin

Three years should be sufficent.

Comment NO: 791	User Name: airgus

I would not want to be trained by an instructor who is not able or doesn't want to upgrade his/her rating within a reasonable amount of time. Same for the aircraft. If I want to fly a sport category aircraft I would like to receive training in an appropriate machine.

Comment NO: 815	User Name: tebrahim

I don't agree,I think a lot of the ultralight instructors will be forced out of the game because of the high cost of these ready to fly planes,which in turn will drive up the cost of learning to fly.The part 103 exemption used kit built trainers & the program has been extremely sucessful,why not build on that. I believe there will only be a handful of manufactures building ready to fly planes and they will probably sell for 2 to 3 times the price of current trainers. I do agree that with current ul instructors to get a LSA instructor rating

Comment NO: 829	User Name: gkrug

I agree, with no comment

Comment NO: 843	User Name: SoccerPilot

I strongly disagree! The UL exemption should be a permanent part of Part 103. I believe the homebuilt trainers that UL instructors use to be better than GA! ALL the guys I fly with (including me) have ballistic recovery systems. The only group this will help will be the insurance companies. The cost of a certified trainer will be prohibitive to vast majority of BFI's. The UL program has been extremely safe and successful. FAA should be proud. Why kill it now?

Comment NO: 856	User Name: David Hodgson

I believe ultralight instruction in current 2seat ultralights would become to expensive for most ultralight instructors including myself. This could be potentially life threatening to many would be ultralight pilots. I would recommend that the current training exemption be made a SFAR. Sport pilot would appeal to most trainers but would leave the simplest training in simpler planes alone.

Comment NO: 872	User Name: windele

I believe that an instructor should maintain the right to fly his aircraft for instructional use only. We will continue to need instructors for 103 type ultralights.

Comment NO: 876	User Name: frjn33

I strongly disagree with this part of the proposal. The so-called exemption for instructors does not have to be by exemption. Just make it a part of FAR 103 and stop calling it an exemption. We need more instructors, not less. Phasing out instructors who do not wish to participate in Sport Pilot does not make sense. These instructors are well-trained now. Why put them through more hoops? Also, concerning the provision to phase out all present instructors' aircraft and require them to purchase net certificated aircraft strikes me as another bureaucratic blunder-in-the-making. If in the future an instructor trains in the same aircraft that he or she has been using, what is the risk? That same aircraft could be registered as an airworthy experimental sport plane. Think about the logic -- Is a sport plane certificated as airworthy any more airworthy than an experimental sport plane, also certificated as airworthy? This part of the proposal is especially

difficult to fathom. "The way this section is worded could spell trouble for anyone who wished to fly a rare or unique aircraft. No other aircraft of the same make/model might be available or reasonably available to train in. Keep it simple! "Taildragger" should be one category, not Fisher 202, Minimax, Ultrapup, etc. as separate aircraft to qualify in. Many "fat ultralights" which will end up being sport planes are only one-seaters. No instructor could go with the student in the qualification training. Make the familiarization in very broad categories and it will be both workable and helpful. Also, five hours instruction may or may not be warranted, depending on the category of aircraft for which one is already qualified and the one in which he or she seeks qualification. Please don't make this ponderously complicated! You say "the FAA believes that this training (for compensation or hire) should be conducted with aircraft meeting the requirements of a special, light-sport category aircraft airworthiness certificate." Why do you believe that? What we have been flying should be sufficient for the future if that aircraft qualifies as airworthy. This provision is a boondoggle for some manufacturers, that's all.

Comment NO: 877	**User Name: whiteman**

The exemption should be reviewed at the three year limit. Decide at that time.

Comment NO: 894	**User Name: Spdrflyr**

BAD BAD BAD!!!!!this is the one that's gonna have you shoveling snow in Alaska! If you do this you are gonna hear a cry from the depths of the Liberal Media like you've never heard before. You DO NOT UNDERSTAND THE DEMOGRAPHICS OF THE PEOPLE WHO FLY UL!!!!! If you take away our means to instruct, people are going to go out and kill themselves and others and destroy public property. There is a BIG difference between 1981 and 2002. You might of gotten away with it then but your not gonna get away with it now. All it's gonna take is one poor guy to go out and try to teach himself to fly a UL and Kill somebody on the ground and you guys are going to get it with both barrels from the media. They are gonna eat you alive!!!! (and I wouldn't want to see that happen)

Comment NO: 901	**User Name: tbrandt**

Yes, but I am concerned that other training waivers would/could continue to support training in experimental aircraft like those issued through EAA and PRA. For me this concern is strongest for gyroplanes. For unless there are other clear avenues for training in place, training is haphazard or not pursued and risks to aircraft and persons increase.

Comment NO: 916	**User Name: Gator**

No Comment! I'm GA wanting to go Sport Class also. More cost effective.

Comment NO: 959	**User Name: dfreeman**

Based upon the amount of time it has taken to get the NPRM to this point, I think that three years is probably not enough time for a transition. I believe that five years would be a more reasonable time frame. It is hard to say at this point how long the “consensus standards” will take and how they can be incorporated by the manufacturers. Perhaps the manufacturers can find their market and fine tune the product in five years.

Comment NO: 984	**User Name: kcmalls**

Disagree. The current exemption works well for part 103 and will work well for sport pilot. The cost of buying a certified aircraft will drive most instructors out of the business. Most make little if any profit now. If we don't have instructors where will potential students get their training. Also, if everything is make and model specific for endorsements, how does someone who owns make and model A get instruction if the instructor uses make and model B?

Comment NO: 995	**User Name: Terry Davis**

I don't feel that the problem is with the instructors getting their certificate. But, I wonder how many of them will be able to afford to buy a new aircraft that they can instruct in. I would guess that a lot of them will simply stop instructing. Where will their replacements come from? Instructing at the ultralight level is a labor of love not a big moneymaker. This is a real problem.

Comment NO: 1003	User Name: johnhenderson

No Comment

Comment NO: 1028	User Name: Robert

Instructors must Charge Commensorate with their Financial Investment, and this Ruling Could Limit number of Instructors and Those available might have to charge "BIG BUCKS".Our Ultralight Flying Club all agree this to be true.

Comment NO: 1030	User Name: carltoni

I agree with the 3yr period for instructors to certify as the active instructors are more than qualified and have all the hour requirements. There is a 3hr in Light Sport eligible craft requirement. Does this mean an existing craft, meeting parameters, and reqistering as Experimental? Surely it must, since no Special Light Sport will be available. Or, can it be in any existing craft (registered or not) that would qualify as far as weight, speed, etc.? Since the gyroplane is not being included in the Special Light Sport Aircraft certification, there will have to be a provision made to continue training for hire in Experimental(either amateur-built, or light sport). The nprm mentions possibly using the "letter of deviation authority" to train for hire. Either that, or issuance of a new exemption would still allow for training. The new training exemp. or letter should allow for training to the CFI and Commercial levels to expand our instructor base. The night flying requirement for the gyro rating could be made optional. Historically, gyros are not flown at night and the 3hr night flying req. is excessive and nearly impossible to comply with. If gyros do get included in the Special Light Sport certification and there are none available for purchase at the end of the 3yr period, there should be a provision made for training in existing craft. How about 3yrs, OR until craft available.

Comment NO: 1035	User Name: RFI

I think there are serious problems with this protion of the NPRM. It shouldn't be a problem for an AFI or BFI to get a Sport Pilot Instructor rating but what about having to purchase a new aircraft within three years? How many AFIs and BFIs have the finances to invest in a "certified" Special Light Aircraft? Also, what will happen to the gyroplane AFIs and BFIs if there are no Special Light Gyroplanes to purchase for training? In fact, the 5209 exemption is due to expire in about 3 years, so without renewal of that exemption gyroplanes would be totally eliminated from flying, other than current ultralight gyros and Experimental gyro owners who hire an instructor to train them in their own rotorcraft---or is that option going to be eliminated also? I am gyroplane oriented and was a manufacturer until health problems caused me to "slow down". I am still active and publish a monthly rotorcraft publication. I have received numerous inputs from gyroplane pilots expressing serious concern over the future of gyroplanes after implementation of the Sport Pilot/Light Sport Plane NPRM.

Comment NO: 1048	User Name: George

Harking back to the previous quetion, I do not see why a current CFI would not be allowed to check people out in aircraft types or catagories in which they are currently teaching. For example, if they are teaching in Cheetas why not allow them to check out paople in a SONEX?

Comment NO: 1054	User Name: terryo

SAFETY, I feel the lack of LSP certified aircraft will result in "self instruction" which has aterrible safety record. Keep the option for exemptions open.

Comment NO: 1062	User Name: timshea

I am infovor of retaining the training exemptions for Part 103 training. To rescind them will leave a dangerous "hole" in the 103 training system. Please reconsider this portion of the proposal. It is a system that is currently working. And working well. Some (many) ultralight and potential ultralight pilots have no interest in becoming certificated airmen (for whatever reason). I believe and it is my direct experience as a Certificated Flight Instructor and ASC ultralight instructor that the exemption is a functional, workable system. Tim Shea CFI-G BFI

Comment NO: 1075	User Name: gyrobee

This provision represents the most serious flaw in the proposal. In general, a system of continuing exemptions does not represent good public policy. However, if the present provisionn is enacted, there are two very negative consequences. The first deals with Part 103 training. One of the primary reasons why it was possible to move in the direction of developing Sport Pilot was the generally favorable safety record of Part 103 operations over the past decade. This record represents the cumulative effect of the introduction of readily available flight instruction made possible by the programs developed and exemptions issued to the USUA, ASC, and EAA. The net effect of the provisions now under consideration will be threefold: (1) The number of flight instructors will decline, in part due to the expense of acquiring new training aircraft. (2) The cost of instruction will increase, for the same reason noted in #1. (3) It will be more difficult to obtain training "in type", due to the fact that the aircraft that are likely to be certified will be more complex and probably more "conventional" compared with the existing Part 103 fleet. The result will be to turn back the clock in the sense of undermining the system that has resulted in the recent solid safety record for Part 103 operations. With respect to gyroplanes, many of the ame factors apply. The aircraft that are likely to be certified are not typical of the fleet in general. The number of instructors will decline (there is already a shortage, even with the current exemption system through PRA) and the aircraft that individuals train in will not be typical of what the pilots will actually be flying. Some mechanism needs to be in place that will permit flight instruction in non-certified Experimental or Light Sport Aircraft if we are not to suffer serious set-backs in the flight training area.

Comment NO: 1083	User Name: Flymo

There is a concern that if this is not administered with some flexibility there may be a loss of gyro training amenity. This could be due to the simultaneous burdens of re-qualifying under the new regime and either replacing the gyro or otherwise re-qualifying it. The safety issues that depend on good gyro training mandate great care in making changes. Good liaison is essential. Three years is a good goal, but it should not be compulsory for all if this reduces the training effort. A waiver perhaps?

Comment NO: 1084	User Name: Gyroman

I strongly disagree with this requirement as written--There needs to be continued exemtions allowed in excess of the three year period -- I am a gyrocopter person and this rule will male it very hard if not impossible to get proper training --the last thing we (in GA)need is an increase in accidents due to lack of proper training Mike Schallmann --President PRA Chapter 15 -- Phoenix,AZ

Comment NO: 1108	User Name: fatplane

Why in the world do you want to do this? The EAA (FAA) has stated "This NPRM will finally provide a path that will increase the number of young people entering aviation." This statement is hard to understand. If the FAA will require fully certificated two-place trainers, their cost will more than double. Many BFI's will not "bite the bullet" and plunk down this much money. Those that do will pass the increased costs down to their students. Why will this increase the number of young people entering aviation? Why trash a system and hardware that is already working so well?

Comment NO: 1125	User Name: Topspin

Three years to transition to a sport pilot instructors rating sounds reasonable but rescind the exemptions? You have to be joking! To do this would take us in the gyroplane community back to the days of self training, outlaw pilots and the accompanying poor safety record. What would be the intent? Why would you want to do this? And why would an instructor want to get rid of a perfectly good training machine that meets all of the light sport plane air worthiness standards? It would make more sense to grant air worthiness certificates to any machine, regardless of ancestry, factory built or experimental, that meets the standards. Why would the FAA want to get rid of something that has proven to work under the exemptions? Don't fix something that isn't broke.

Comment NO: 1132	User Name: rotopup

The current training exemptions have worked very well. They should not be recinded.

Comment NO: 1139	User Name: 21214

In the case of gyroplane training, this would only increase the odds of student pilots trying to train themselves, as it would probably decrease the already small number of CFI's that we now have. Please don't do away with these exemptions!

Comment NO: 1172	User Name: jonvee

The system works very well as it is. Don’t try to fix it.

Comment NO: 1180	User Name: heronium

this will incress the cost and keep many people out of ultra lights due to the high cost

Comment NO: 1208	User Name: Russ King

Don't do anything that would discourage proper gyroplane training.

Comment NO: 1216	User Name: PWPlack

No Comment

Comment NO: 1226	User Name: helitim

The gyroplane community would be left wihtout instructors. An exemption, waiver, or grandfathering option of some type must be utilized as appropriate.

Comment NO: 1250	User Name: pokey1652

Allow sport pilots/aircraft to tow hang gliders (with appropriate training and endorsement) before you get rid of the exemption, or you will leave a lot of hang glider pilots with no tugs to get airborne.

Comment NO: 1252	User Name: Goflyslow2

The FAA states that the three (3) exemptions from § 91.319(a)(1) and (2)and 14 CFR part 103 of the Federal Aviation Regulations (FAR) to permit training flight training are to be recinded. There are actually nine (9) exemptions that have been granted by FAA. that allow flight training in non-type certificated aircraft for hire. 1. Exemption No. 7390 permits ASC members who own an aircraft with an experimental certificate to be compensated for the use of the aircraft in transitional training conducted by authorized flight instructors. 2. Exemption 7162 permits "EAA members who own an aircraft with an experimental certificate to be compensated for the use of the aircraft in transitional training conducted by authorized flight instructors. 3. Exemption No. 5029 permits PRA members to conduct INITIAL flight training in experimental aircraft. 4. Exemption No. 5966 permits Mr. James S. DiGaetano, Jr., President of LesAir, Inc. to conduct INITIAL flight training in experimental aircraft. 5. Exemption No. 6080. permits USHGA to conduct tandem non-instructional and instructional flights in hang gliders. 6. Exemption No. 4144 permits USHGA to conduct towing operations in ultralights, instructional and non-instructional. 7. Exemption No. 3784 permits ASC to conduct flight instruction in two place ultralights. 8. Exemption No. 3784 permits EAA to conduct flight instruction in two place ultralights 9. Exemption No. 4274 permits USUA to conduct flight instruction in two place ultralights It would appear, by this section question, that FAA has lost count of the exemptions issued. Or, that FAA is targeting only the powered Ultralight organizations for removal of exemptions. The FAA has stated that it is not their intent to rule/regulate by exemption, yet continues to issue these exemptions. Each issuance is noted by the FAA "in the interest of safety and in the best interest of the public" These exemptions are STILL appropriate and in the interest of safety and in the best public interest. Either continue the exemptions or codify them without substantive change. Charles L. Scrivner - Private pilot

Comment NO: 1257	User Name: Dugaru

No Comment

Comment NO: 1265	User Name: skiptyler

The BFI program for ultralights should be maintained. Sport Aircraft and ultralights are two different catagories.

Comment NO: 1272	User Name: James48843

Three years is sufficient for all operators who will be covered by the Sport Pilot regs. Aircraft such as gyrocopters not covered by the new regs should be given opportunity to apply for exemptions as deemed necessary in the interest of safety.

Comment NO: 1277	User Name: t2rogered

I disagree. It is unlikely that 3 years will be enough time to allow the instructors to equip themselves with aircraft meeting FAA requirements. Cost will likely be prohibitive. The FAA should allow continued use of existing 2 place machines beyond the 3 year period.

Comment NO: 1331	User Name: RTHOMPSON

I don't see the need to change the exisiting exemption, or at least "grandfather in " current instructors.

Comment NO: 1350	User Name: GeraldEmery

needs more study

Comment NO: 1351	User Name: GeraldEmery

needs more study

Comment NO: 1395	User Name: dschach

The FAA is asking three separate questions. The first is whether the training exemptions should be rescinded. The second is whether experimental light sport aircraft should be used as trainers after 3 years and the third is whether 3 years is a sufficiently long transition period. Rescinding the training exemptions after 3 years will be a disaster. It will leave the ultralight community without instructors and it will set everyone back to where they were in 1982. As proposed, light sport aircraft are substantially heavier (1232 lbs.) and faster (132 mph) than both ultralights (254lbs + pilot and 30lb fuel = 500 lbs, 63 mph) and ultralight trainers (496lbs + instructor and student = 992 lbs and 87 mph). Why should an ultralight pilot who wants to fly a Quicksilver or an Air Creation Fun Racer have to train in aircraft that weighs twice as much and flies almost 3 times as fast? Will this type of training improve ultralight safety? Rescinding the exemptions will put many ultralight trainer manufacturers out of business. What ultralight instructor will purchase a new aircraft when that aircraft will not be useable as a trainer after 3 years? The uncertainty of the sport pilot proposal and the consensus standard will cause many pilots to delay purchases. This will cause serious financial damage to ultralight manufacturing businesses. In the NPRM, the FAA states that the two place training exemption has existed since 1995. This is incorrect. There has been a two place training exemption in one form or another continuously since 1983. The FAA notes that the national organizations have improved ultralight safety through their training programs made possible because of the exemptions. Let’s not destroy something that works. Ultralight instructors are not trying to build hours like CFI’s. Most instruct part time as a hobby for the love of flying. They own an ultralight that they maintain themselves. To continue instructing under sport pilot will take a lot of time and money. I won’t list all of the obstacles but it includes q Finding a DAR familiar with ultralight trainers q Finding a sport pilot CFI with 5 hours in make and model q Passing the written test for sport pilot q Finding a sport pilot DPE q Passing the oral and check ride q Repeating the above for sport pilot CFI q Take an 80 hr maintenance course q Purchase a new light sport aircraft trainer This is a considerable investment of time and money. If sport pilot instructors have to retire their existing trainer and purchase a new light sport aircraft, most will stop instructing. Without sport pilot instructors and aircraft, who will train the sport pilots? The FAA believes that that training for compensation or hire should be conducted with aircraft meeting the requirements of a special, light-sport category aircraft airworthiness certificate. However, the FAA provides no evidence that ultralight trainers are unsafe for instruction. A DAR will have inspected an ultralight trainer that is converted to an experimental light sport aircraft and

a repairman with a maintenance rating will maintain the aircraft. This aircraft should be even safer than current ultralight trainers. There is precedent for using experimental aircraft as trainers for compensation. The FAA has granted multiple exemptions to the EAA, ASC and others allowing flight instruction for compensation in experimental aircraft. Therefore, the FAA should allow all existing ultralight trainers that are converted to experimental light sport aircraft to be used as trainers for the life of the aircraft. Finally, is 3 years a sufficiently long transition period? As a weight shift instructor, I am concerned about the number of DAR's familiar with weight shift aircraft and the number of DPE's who will be able to administer the practical test. To the best of my knowledge, there are a very small number of DAR's who have inspected weight shift aircraft and there is currently only one DPE in the entire country that has done a practical test in a weight shift aircraft. Given the low number of qualified DAR's and DPE's, I believe that 3 years is insufficient time for transitioning weight shift pilots and aircraft.

Comment NO: 1409	**User Name: humair14**

none

Comment NO: 1416	**User Name: RichJennings**

The proposal to do away with UL Training exemptions, (after 3 years or any lenght of time), will be a giant step backwards for the safety record of Ultralight flying. It is precisely this "logical allowance" by the FAA over the last 19 years, that has made learning to fly Ultralights, safe and do-able, at a reasonable cost to the new pilot. If, indeed the intent of the proposal was to bring "flight training" under greater control, then I can see some justification for it, as far too many two-place Ultralights have been bought under the "pretext" of being used to conduct flight training, and then they never truely were. I believe it is the fault of manufacturers willing to forsake proper verification of the buyer (related to their flight instructor status), in order to sell aircraft. The current remedy I would like to see is that current UL Instructors under USUA, ASC, and EAA be allowed to continue their business, but only upon proof of conducting REAL flight training with "logged" and verifiable (documented) student pilots. If an owner of a two-place UL cannot show this proof, then it will show the FAA that their intentions were to subvert the program in the first place and fly "as they wished" without going through the proper steps to register their aircraft or get pilot certificates. At the very least, if FAA wishes to push forward the proposal as it stands, I believe that current UL Instructors should be Grandfathered into the Sport Pilot Instructor program, (based upon proof of a certain number of hours of actual, real, verifiable student instruction). Rich Jennings, President, Dayton Ultralight Club

Comment NO: 1427	**User Name: biz451**

For Powered Parachutes (PPCs), emphatically not. The present part 103 training exemption for PPCs provides reasonably safe recreational and training flight for pilots who comply with the system. The non-compliant pilots have the majority of the accidents, and increasing their regulatory burden, by eliminating part 103's training exemption under sport pilot, will do nothing to increase compliance, and in fact reduce it. Part 103's training exemption should be continued, and modified into a heavy/2place exemption for pilots who which to fly 2 place machines for recreational (not commercial or training) purposes. This exemption would allow 600lb unoccupied weight, two seats, and unlimited fuel. Since PPCs are inherently speed and performance limited, these increased limits would only increase safety-- through more robust planes and greater safety devices-- and not endanger the general populace. Eliminating the training exemption would be a big mistake, for it would damage the present system, which works for those who use them, whereas Sport Pilot is unproven and less desireable to PPC fliers.

Comment NO: 1441	**User Name: KendallDucote**

Why not just make the exemption a rule. It seems to work well as is. It can coexist with Sport Pilot.

Comment NO: 1462	**User Name: llhoedl**

No Comment

Comment NO: 1467	User Name: Parris

I AGREE AS WRITTEN

Comment NO: 1471	User Name: sleepy

As I stated before, I think that rules pretaining to PPC and/or weight shift craft could be incorporated into Part 103 with ease. Part 103 and the training exemptions appear to be working fine to me.

Comment NO: 1472	User Name: sleepy

No Comment

Comment NO: 1491	User Name: mikehuckle

This is the worst idea in the proposal. It puts severe unnecessary pressure on the sport of Ultralighting, and there is no good reason to do this. There are many active UL instructors, who for whatever reason, simply don't wish to make the move to Sport Pilot Instructor. They very keenly want to continue to provide instruction in UL as they have been doing. They have done this succesfully for many years, and their record shows they do this with a high level of safety, and make the sport much safer for newcomers. I think the FAA wants to ensure that those pilots holding BFI ratings who are not actively instructing, should become Sport Pilots. And that FAA feels they need to coerce these pilots to become Sport Pilots by removing the training exemptions. This (migration of non-active UL instructors to become Sport Pilots) could be achieved by other means, rather than withdrawing the exemptions which have served UL well for many years now. It is far too risky at this time to even begin to plan the removal of the UL training exemptions, and this idea should be put on the back-burner for at least the next 5 years. At that time (in 5 years), the FAA could re-assess the situation, and if the exemptions are still required, then leave them in place even longer. If the reason FAA intends withdrawing the training exemptions is because FAA really does not like "ruling by exemption", then please make the training exemptions either a permanent FAR or an S-FAR.

Comment NO: 1519	User Name: bjmoore

Disagree wholly with this. It will result in the loss of an instruction base for 103 as well as pilots wanting to operate as sport pilots. Consider allowing compensation to continue and require that instructors explain the nature of "experimental" or "special" light sport aircraft so the students will understand the limitations of each. Or/and Allow Sport Pilot Instructors who own ELAC to continue to instruct for compensation to part 103 through a BFI program authorized not by exemption, but incorporated into an SFAR. Otherwise, expect an increase in 103 incidents and no training base for the light sport class and for this proposed airman certificate. The overall results will be failure of participation in this rule (like rec pilot) and loss of safety and training base for part 103 activities.

Comment NO: 1536	User Name: sam

I agree with Rich Jennings' post. If UL instructors have been doing this for years, why should they have to be re-evaluated, especially if they are already recognized by an association. Grandfather them into LSA instructor with verification of training time and let them go. Also, grandfather their two-place aircraft into LSA, N-number them and let them go as well. I like the idea of maintaining the training exemptions for longer than three years. Give the GA community time to absorb the rule and quantify its impact. If after that time there is a marked transition from strictly UL to LSA, then consider setting a time limit to do away with the exemption.

Comment NO: 1540	User Name: Bill Bardin

Absolutely not. Exemption-holding instructors are the only ones who will carry this new ruling through, if at all. The ruling punishes them by not recognizing their skills (all flight hours, etc.) They should be automatically grandfathered into the positions the FAA will need to make the ruling work. Forcing them to spend about 3 times more for their aircraft than a person who is not an instructor, is crippling,not in the public interest, and will severely limit the amount of instructors available. A similar scenario is for a GA pilot to pay $174,000 for a Cessna 172, but if is to be used by a flight school, now it's going to cost $522,000. Again, ridiculous.

Comment NO: 1568	User Name: ultraj51

No Comment

Comment NO: 1581	User Name: dschach

Comment previously posted by I selected "agree" instead of "disagree" when posting.

Comment NO: 1594	User Name: harveyking

I believe that the flight training schools of today will not meet the needs of pilot training relevent to 103 flying. In case this proves to be true, the present BFI system needs to be preserved. I recommend that the BFI be made a perminate rating. That the BFI be required to obtain at least a Sport Pilot rating. Because the present BFI training system is seriuosly under funded, I submit that removing these 2 place trainers from service will consitute a major finacal burden from which the BFI network will not recover. Since some exceptions will need to made to the commercial use rule, the ExLSP should be allowed to be used to train NON certified pilots. (103) This way the BFI will have some certifiated training to carry a passenger and the A/C will be recieving regular maintance.

Comment NO: 1601	User Name: davidbauch

If flight instructors will be required to purchase a "certified" aircraft for each type used in instruction at additional expense after three years it will reduce the number of instructors, and in turn, increase the travel time and cost of instruction

Comment NO: 1620	User Name: JSTO1

This item is counter productive and imposes a significant penalty to current instructors and equipment owners. Requiring current UL instructors to obtain a certificate to become a sport pilot instructor is reasonable. It will have a positive return on investment if they plan to instruct in the new class. They should receive credit for existing experience which has been documented with their sponsoring organization. Continuation of use of the current equipment should be allowed as long as it is maintained in a safe operating condition. Certified aircraft and experimentals have demonstrated that age is not a reason for becoming unairworthy. Using the existing resources is a win-win for the public. They can participate in the UL class if they desire and then transition to Sport Planes & Pilot with a small incremental cost. Removing the exemption is not in the public interest, it will reduce the number of existing resources and add unnecessary cost. Current active instructors should be allowed to continue practicing and additional participation encouraged by continuing the current system.

Comment NO: 1641	User Name: sam

I believe that it would be wise to continue with Sport Pilot, but instead of rescinding the Part 103 exemptions, make them a permanent part of 103. Then make an amendment to 103 that allows those who are currently UL instructors and those who own and operate "fat" ultralights to continue to fly their vehicles, but now with a regulatory document available for them. This seems that it would be the best of both worlds. It would allow those ultralighters who don't wish to upgrade to Sport Pilot to continue to fly and have regulatory oversight, while still creating a viable way for new, current and former aviators to get into the air much faster and much cheaper. It looks like it would be a win-win proposition.

Comment NO: 1661	User Name: TOMS

If the owner/builder of an aircraft has dual capacity an instructor should be alowed to instruct the owner in his own plane

Comment NO: 1680	User Name: john brady

I think that this is reasonable amount of time. The 3 yrs should be enough time to get this job done. I think that this should be an improvement as it defines the training that a person will have to have to instruct in an LSA as outlined in the NPRMfor LSA.

Comment NO: 1687	User Name: bliddel

Many of the part 103 Ultralights out there were built to carry single pilots who weigh more than 255 pounds all by themselves. Part 103 is fine as is, and can (and should) co-exist with this NPRM. Anything that undermines the incentive to offer flight training (at any level) will be the most counterproductive thing the FAA can do. Flight training reduces accidents more cost-effectively than anything else the FAA (or the military) can do. The FAA is still the world's largest user of vacuum tubes, and we still have VORs that are 50 plus years old! The Microwave Landing System was a disaster! The Mode S transponder requirement was wholly unworkable! When did anything the FAA ever proposed ever actually occur on schedule (except for the infamous emergency revocation of Robert A. Hoover's medical certificate)? A three year curtain in part 103 instruction is horrifyingly analogous to a three year delay in the preventable deaths of hundreds or thousands of well-meaning innocent taxpayers. Please do nothing to figuratively suck the remaining air out from under the wings of flight instructors (who put their lives on the line every day to make the sport much safer for everyone else). P.S. I do not instruct, but I would - if I could afford the numerous required ratings, the "superman" medical certification, and the outlandish insurance premiums.

Comment NO: 1696	User Name: live2av8

NO, either make the exemption part of a special FAR (like Sport Pilot is) or keep the exemptions as is until there’s a final rule which is actually workable for the ultralight community, Sport Pilot will not be it. If Sport Pilot has 90% participation like the FAA felt Part 103 had when written in 1982, then I would consider it a success. Let Sport Pilot achieve success on it’s own merits, and not by the mandatory inclusion of the ultralight community. In questioning 14 other exemption holders in my area, none are interested in becoming Sport Pilot Instructors, 2 are contemplating becoming 2-place Sport Pilots, the others stated they feel it’ll be safer if things were to remain status quo, than when Sport Pilot is fully implemented. -live2av8-

Comment NO: 1701	User Name: roycaton

If there is no reason other than a procedural one for lifting the exemption and there is not a safety issue, I am in favor of keeping the exemption. I think most instructors will earn the sport pilot instructor rating but I'm in favor of leaving all options open.

Comment NO: 1711	User Name: Pam

Fewer Powered parachute instructors than the FAA thinks will ever tansition to sport pilot instructors. LEAVE THE EXEMPTIONS IN PLACE so that there will be ultralight instructors or the safety factor of ul instruction for PPCs will drop not be increased

Comment NO: 1716	User Name: slawek

Totally DISAGREE!!! Unless a new, permanent rule, taking place of the renewable exemptions is implemented, eliminating exemptions will destroy the sport of hanggliding in all flatlands!

Comment NO: 1720	User Name: bleddy

Training ultralight pilots in conventional aircraft is a BAD IDEA. The handling characteristics of Ultralight aircraft are quite different. I have known of a number of accidents in ultralight aircraft being flown by very experienced pilots. In particular the steep initial climbout of a typical ultralight is sometimes unexpected and disorienting to qualified pilots not trained in an ultralight.

Comment NO: 1744	User Name: gyrochuck

Ratings: Private Pilot Airplane Single Engine Land -1100 hrs, 250 hrs. of which would now be considered to be in the Light Sport Category Rotorcraft-Gyroplane - 60 hrs. Basic Flight Instructor F/W, Gyroplane thru ASC 110 hrs. As one example, 1.) Because gyroplanes could not be certificated under § 21.186, they would not be eligible for airworthiness certificates under § 21.191(i)(2) and (3). This would mean after three years, training for gyroplanes would not be available, except under exemption 5209. And it is unknown at this time if the 5209 exemption will be continued. This will severely compromise the safety of people attempting to learn to fly gyro's. If adequate training is not available people will attempt to self teach themselves. Although gyro's are relatively easy to fly once mastered. The initial learning is the hardest part and the learning curve is much safer with qualified instruction. I also agree with EAA's proposed change to this part of the proposal.

Comment NO: 1749	User Name: Goflyslow2

FAA states that the first Ultralight training exemptions were issued in 1995. This is WRONG. As well as many other assumptions and statments made by FAA. If FAA can't keep track of their own exemption process, then how can they even begin to Write Regulation. Example of Exemption - 1983 -85 UNITED STATES OF AMERICA DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION WASHINGTON, D.C. 20591 * In the matter of the petition of * * EXPERIMENTAL AIRCRAFT ASSOCIATION * Regulatory Docket * No. 23477 for an exemption from Section * 103.1(a), (e)(1), and (e)(4) of * the Federal Aviation Regulations * GRANT OF EXEMPTION By petition dated December 10, 1982, Mr. Paul H. Poberezny, President, Experimental Aircraft Association (EAA), Post Office Box 229, Hales Corners, Wisconsin 53130, petitioned for an exemption from Section 103.1(a) of tne Federal Aviation Regulations (FAR). Additionally, the Federal Aviation Administration (FAA) has determined that an exemption from Section 103.1(e)(1) and (e)(4) would be appropriate. An exemption from these regulations would permit EAA to operate powered ultralight vehicles at an empty weight of more than 254 pounds, that has a power-off stall speed of more than 24 knots calibrated airspeed (KCAS), and with two occupants for the purpose of flight instruction. Sections of the FAR affected: Section 103.1(a), (e)(1), and (e)(4) defines, in pertinent part, the term "ultralight vehicle." For the purpose of this part, an ultralight vehicle is a vehicle that: "Is used, or intended to be used for manned operation in the air by a single occupant; . . . If powered, weighs less than 254 pounds empty weight; . . . Has a power-off stall speed which does not exceed 24 knots calibrated airspeed." The petitioner's supportive information is as follows: The EAA petitions for an exemption to allow flight instruction in two-place ultralight vehicles. Additionally, it requests that the maximum empty weight limitation for powered ultralight vehicles be raised from VS-83-098-E 254 pounds to 350 pounds. This training is to be accomplished by an FAA certificated flight instructor or an instructor authorized under an ultralight vehicle pilot competency program, that is recognized by the FAA. This instructor must be aboard each flight. The EAA is an organization devoted to recreational and general aviation activities. The association, formed in 1953, is one of the world's largest organizations devoted to these activities, with membership in excess of 85,000. The EAA Ultralight Association, a division of the EAA, has a membership in excess of 5,000 and is devoted solely to the promotion of ultralight aviation, safety, and education. The EAA believes this exemption would be in the public interest and desires to reduce the number of accidents and injuries to persons teaching themselves to fly. Approval of this petition will not violate the intent of the FAA's restriction to single place occupancy because a flight instructor will be required on each flight. This will not lead to carrying passengers for hire, a danger which FAA was desirous in addressing. EAA will be willing to have this exemption granted to them for further administration, and all records and other data under the provisions of this exemption will be maintained by EAA. EAA will administer this exemption for all participants who qualify. For many years the EAA has been accumulating accident/incident reports. A review of those reports indicates that a high percentage of accident's which result in injury and fatality is a result of persons attempting to teach themselves to fly. Some of these accidents occur when instruction is provided by preflight briefing or ground instruction only; much of which was developed in the days of the Wright Brothers. A summary of

this petition was published in the Federal Register on January 20, 1983 (48 FR 2617). No comments were received. The FAA's analysis/summary is as follows: On October 4, 1982, Part 103 became effective to govern the operations of ultralights in the United States. The FAA has determined that rules governing ultralight vehicles are needed to achieve an acceptable level of safety within certain airspace and to protect persons and property on the ground. The intent was to provide for safety with a minimum amount of regulation. Accordingly, ultralight vehicles are exempt from certification and registration requirements. Similarly, pilots of ultralight vehicles are not required to possess an FAA pilot or medical certificate. The FAA has chosen not to promulgate regulations regarding pilot certification, preferring that the ultralight community assume the initiative for developing and administering, under FAA guidelines, a national pilot certification program. The ultralight community is expected to take positive action to develop this and other safety programs in a timely manner and gain FAA approval for their implementation. The FAA recognizes the value of the services rendered by the EAA and other aviation safety organizations to the ultralight community. Furthermore, the FAA considers it to be in the public interest to promote the programs of these organizations whenever possible. The FAA also agrees with the EAA's statement that a grant of exemption would not be contrary to the sport and recreation aspect of ultralight vehicles. The instruction which would be allowed under the exemption should not be confused with the operation of the ultralight vehicles by the pilot, which is restricted to sport or recreation purposes. For example, while a pilot may rent an ultralight vehicle and pay an instructor for his services, the resulting operation is for the pilot's personal recreation. Therefore, an exemption from Section 103.1(b) is not needed and will not be included herein. The FAA is concerned, however, that unrestricted operations of ultralight vehicles would not be in the interest of safety. The basic purpose of Part 103 is to allow single- occupant vehicles to operate for sport or recreational purposes without being subject to the same regulatory requirements imposed on certificated aircraft operations. Nevertheless, the EAA has more than adequately shown how it would operate under an exemption, with limitations, with an equivalent level of safety. Additionally, the exemption would assist the EAA in its efforts to comply with the national self-regulation program for ultralight vehicles. Accordingly, prior to submitting a request for renewal of this exemption, EAA should provide information which would show how this exemption positively affected aviation safety and how its issuance has been in the public interest. The EAA requested that it be allowed to operate ultralight vehicles with a maximum empty weight of 350 pounds. The FAA agrees that the weight restrictions for powered two-place ultralight vehicles may be raised to accommodate for greater structural strength. Additionally, the FAA believes that the maximum power-off stall speed should be raised to 29 KCAS to compensate for this added weight. In consideration of the foregoing, I find that a grant of exemption is in the public interest and will not adversely affect safety. Therefore, pursuant to the authority contained in Sections 313(a) and 601(c) of the Federal Aviation Act of 1958, delegated to me by the Administrator (14 CFR 11.53), the individuals authorized by the Experimental Aircraft Association, to give instruction in ultralights, are hereby granted an exemption from the Federal Aviation Regulations to the extent necessary to operate powered ultralights of not more than 350 pounds empty weight, that have a power-off stall speed of not more than 29 knots calibrated airspeed, and with another occupant for the purpose of flight instruction. The exemption is subject to the following conditions and limitations: 1. Each operation must comply with all sections of Part 103, except Section 103.1(a), (e)(1), and (e)(4) of the FAR. 2. The ultralight shall display the following placard: "To be used for instruction only." This placard must have letters at least 1/2 inch in height and at a location easily visible and legible to all persons entering the ultralight vehicle. 3. All flights carrying two occupants shall be for the purpose of instruction, and one occupant must be either an FAA certificated flight instructor or a person recognized by the Experimental Aircraft Association as qualified to give instruction in an ultralight. 4. All single-occupant flights are restricted to those associated with instruction, such as ferrying the vehicles between locations where instruction will be conducted, and must be operated by a person authorized in paragraph 3 to give flight instruction. 5. Prior to all two-occupant flights, the student must be informed that the flight is conducted under an exemption granted by the FAA and that the ultralight does not meet certification standards set forth by the FAA. 6. For identification purposes, the Experimental Aircraft Association shall issue an individual authorization to each person allowed to conduct

operations under the exemption. Each authorization shall include an identification number and a copy of this exemption. The Experimental Aircraft Association shall also have a procedure to rescind this authority when needed. 7. Each individual who operates an ultralight under the authority of this exemption must be familiar with the provisions contained herein and must have in his or her personal possession a copy of the authorization issued by the Experimental Aircraft Association and a copy of this exemption. These documents shall be presented for inspection upon request by the FAA. This exemption terminates on June 30, 1985, unless sooner superseded or rescinded. /s/ Kenneth S. Hunt Director of Flight Operations Issued in Washington, D.C., on June 9, 1983.

Comment NO: 1755	**User Name: BigSkyAviation**

The 3 exemptions to part 103 allowed a self-supporting training system to be grown. This system operated without governmental oversight when viewed at the grass-roots level. It produced many safe instructors who trained many safe pilots. The aircraft that are used as trainers were maintained by the BFI owners who passed that knowledge on to the students as part of the training. This system works! Not broken. What was broken with there being 3 exemption orgs was the competitive pressure. Aircraft which were too heavy / too fast were registered as trainers. All 3 orgs were guilty of this but the EAA was one of the worst. It is amusing that the EAA has come out with lists of planes which fit the proposed rules but they could never determine which planes were legal 103 trainers. An example is a 100HP Skyboy (or any Skyboy) registered as a UL trainer. The EAA has registered these. I think that the 103 training exemption should be made law under a SFAR to 103 and be administered by a single org which would be subject to replacement if aircraft outside the limits were registered or non-active instructors kept on the rolls.

Comment NO: 1766	**User Name: edburkhead**

At first, I thought this seemed like a good idea. Upon review, I think that the restrictions upon the Light Sport Aircraft category will be sufficiently tight to stifle innovation. It is the innovation and participation we're striving to improve.I now think it would be better to permanently codify the "exemption" for 2-place "ultralights" with the addition that a 2-place ultralight could be flown permanently by a pilot who can demonstrate the FLYING COMPETENCE of a BFI WITHOUT having to show instructional ability. If a BFI can safely TEACH based on a certain flying competence, someone with the same competence is clearly able to fly with a passenger. This should be done under "ultralight" rules, allowing planes with the same characteristics as now allowed under the "exemption." We can placard the plane "UNLICENSED ULTRALIGHT – NOT LICENSED, INSPECTED OR SANCTIONED BY THE FAA" if you like. This WILL maintain the freer development environment that'll let us come from behind in world light-aviation.

Comment NO: 1774	**User Name: Kealen**

I do agree with the entire Sport Pilot NPRM proposal except this one. As a new manufacturer of a FAR part 103 Ultralight that has 2 engines, the Sport Pilot NPRM will make training to fly this aircraft prohibitively expensive and logistically difficult. Under the Sport Pilot NPRM, a two seat version of my FAR part 103 Ultralight will not be able to be registered as a Sport Aircraft, and flown by a Sport Aircraft CFI, because it has 2 engines. Therefore, the trainer version of my FAR part 103 Ultralight will be required to be certified as an Experimental twin engine aircraft, and instructors must be FAA certified Twin engine CFI's. In essence, to teach Ultralight pilots to fly, an instructor will have to obtain training in a Beech Baron, or a similar light twin-engine aircraft. From a safety standpoint, it is necessary to train Ultralight pilots, but by not allowing twin engine "Sport Pilot Aircraft", the FAR's create an excessive burden on my business. Additionally, by discontinuing the exemptions, my company will be inequitably burdened in the Ultralight industry. I do not suggest that the FAA keep the exemptions as they currently stand, rather I would suggest that the NPRM adapt the ability to request an exemption to the FAR's for unique circumstances, for training purposes only. This would allow manufacturers of FAR part 103 aircraft to train pilots in similar aircraft that do not meet Sport Pilot Aircraft registration requirements. This is an issue of financial burden for Ultralight manufacturers, and most importantly, an issue of safety in training Ultralight pilots to safely operate their vehicles that may be equipped with devices that are prohibited in the Sport Pilot category aircraft.

Comment NO: 1779	User Name: flylite447

Including FAR 103 instruction with Sport Pilot regulation will compromise ultralight safety. Sport planes are not ultralights. Pilots trained in Sport Planes are not trained to fly FAR 103 ultralights. A sport plane COULD resemble an ultralight trainer, but many (probably most) clearly will not. Requiring ultralight pilots to train in Sport planes is like requiring private pilots to train in light twins. It doesn't make any sense.

Comment NO: 1787	User Name: whr

DISAGREE... The current exemption system has been working well for many years. At the end of the 3 year period no existing ultralight trainer planes can be used for instruction. JUST to instruct you must purchase a new "certified" airplane ($$$). Most BFIs instruct as a hobby. We certainly can't make enough money training to justify the additional purchase/cost of a new plane. Not many current BFIs will go on to get the SP Instruction certificate. So, we will have fewer instructors, charging higher rates. Please allow existing trainers that pass as airworthy to remain in the system as trainers? Don’t loose the current BFI/AFI instructor network!!! Please grandfather existing instructors into SP or create a SFAR retaining the training exemption.

Comment NO: 1789	User Name: steve.stefanic

Disagree also. The transition from a Sport Plane to a single place UL is too great. There will be some interesting & unsafe first solo flights in the single-place UL after being trained in a quite different "Sport Plane".

Comment NO: 1818	User Name: DFE

Your selection buttons didn't leave the option of Yes and No. Ultralight training is for Ultralight Vehicles. If you take this away, you're violating most of your arguments for Sport Pilot, with respect to flying under FAR 103. I don't have a problem with requiring some inspection of a 2-place training aircraft by a disinterested third party, should such a knowledgable entity exist. I have seen both well constructed and maintained aircraft, single and 2-seaters used for instruction. I have also seen things that are very scary. I have a real problem with the theory that there will be certificated trainers appropriate for ALL Ultralight training. I doubt that such will even exist for all Sport Pilot aircraft. Some consideration for training of FAR 103 pilots must be taken, whether it's the current exemption, or something better. Non-certificated Sport Planes is a possibility. This will have the airworthiness inspections that will weed out the junk, but will allow training for hire in something rather similar in make and model to the single place Ultralight Vehicle.

Comment NO: 1819	User Name: DFE

Adding to my previous comment. I have no problem with those training any type of pilot, ultralight or Sport Pilot, being required to be a Sport Pilot Instructor. I haven't seen much difference between the requirements for the exemption and for Sport Pilot instructor. My reservations are concerned mainly with the aircraft requirements. Maintenance is good. Some of today's Ultralight Instructors are also the best source of maintenance for their aircraft. Inspection is also good, and this is a deficiency in the current exemption programs. I'd like to see a knowledgable third party, or a qualified owner, inspect any aircraft that carries more than one person. As in experimental aircraft, the builder can get a repairman's certificate. A buyer cannot. Requiring certificated aircraft for 'instruction for hire' is just plain dangerous, and will increase incidents, accidents, and deaths.

Question Number 6 - The FAA is proposing to require 80 hours of training for a repairman certificate for maintaining and inspecting special light-sport aircraft used for rental and training. Do you think 80 hours of training is appropriate for this purpose?

(6) The FAA is proposing to require 80 hours of training for a repairman certificate for maintaining and inspecting special light-sport aircraft used for rental and training. Do you think 80 hours of training is appropriate for this purpose?

Visited: 286	Total Comments: 108	Last Post: 5/6/02

Comment NO: 25 **User Name: delta2ul**

However, I think the training should be segmented into general practices and then type specific.

Comment NO: 47 **User Name: capella1**

We beleive the time required for this training is variable and related to the complexity of the specific aircraft. It is perhaps better left to the manufacturer of a SLSA to determine the the level of knowledge and skills required for their products.

Comment NO: 52 **User Name: RDavis**

The two seat light aircraft not used specifically for Part 103 training should be converted to the existing experimental category and the current rules should apply. The creation of a new class of A&P license is not necessary.

Comment NO: 67 **User Name: flyfree**

You've GOT to be kidding! While some could do it in a few hours because of past experience, they don't count. You're asking if 80 hours for ANYONE is enough. A whole different way of dealing with this issue will have to be created. Some people couldn't do good maintanance with 80 years of experience!

Comment NO: 82 **User Name: Bradley**

No Comment

Comment NO: 97 **User Name: artspain**

No Comment

Comment NO: 109 **User Name: Bill Cartwright**

I disagree due to each UL pilot has rebuilt or repaired his craft without the need of a 80 hour course. I believe the existing pilots with papers, Org. Pilot, BFI, AFI should be carried over into the new Sport Pilot without this course. The new Pilot should be submitted to a 20 hour course as the planes are quite simple. 80 Hours is completely out of line with reality. Thank You

Comment NO: 123 **User Name: w1bfn**

80 hours might be enough to teach a resposible technician to inspect LS aircraft, but I suggest that if a person is to be responsible for maintenance, he/she should also be certified in the make and model of the engine with which the machine is equipped.

Comment NO: 140 **User Name: daberti**

This should be enough for the generics but for major repairs would probably be inadequate.

Comment NO: 157 **User Name: barnesrc**

I agree. In order to safely maintain your aircraft, you should have either built the aircraft, or had training from the aircraft manufacturer on how to maintain it. To many people think they know how to properly maintain it but really dont.

Comment NO: 173	User Name: Ultraliteteacher

The 80 hours is both too much and not enough. There should be tests one must pass. No matter the timeframe of study, 70% (faa standard) and you are in. Less than 70 and you need more study. This has knowledge as the principle factor of merit, not hours. Additionally, the way it is worded, it appears for those that have 5 different aircraft all using the same engine, class would be repeated 5 times for the engine. Also, are we expected to travel to France to obtain schooling on our French-Built plane? I am no foe to training, but perhaps some common sense can be applied here? Challengable tests for the existing 'masters' and sectionable courses (airframe stress/airframe completeness/engine/etc) cumulating in 80 hours equivalence.

Comment NO: 197	User Name: sthomason

f the purpose of the training is to inspect, perform preventative maintenance, or change-out of basic components (wheels, lights, propeller, instruments, etc), then yes. If the purpose is to do major structural repairs or restoration, engine overhauls, or design changes, then I would like to see a higher level of experience for those working on aircraft for hire (that's a "No").

Comment NO: 213	User Name: Batson

I generally agree. But a hard and fast timeframe may not be the best approach. There needs to be a way for some adjustments as the programs progresses. Some more time may be necessary or recurrent training required.

Comment NO: 231	User Name: nleggett

This sounds like a reasonable requirement to me. I would like to take this type of training and be able to maintain the light sport aircraft that I purchased. Perhaps some type of final exam should be included as part of the course. Nickolaus Leggett, Private Pilot

Comment NO: 234	User Name: sheintz

Generally, I agree. However, like all training, the quality of the training is more important than the actual hours. Emphasis should also be placed on the powerplant with a specified minimum number of hours required devoted to engine training (i.e. 40 hrs).

Comment NO: 252	User Name: E002SA

It is entirely dependent on the cost of that training. If the training requires travel to Kansas, airline and hotel fares along with the cost of the class and materials, then it seems excessive.

Comment NO: 315	User Name: SunKissed

No Comment

Comment NO: 328	User Name: challengerpilot1

I generally agree with this. If you are going to work on someone else's plane for hire then some training is required.

Comment NO: 389	User Name: bobkat

80 hours of training may be enough to maintain a plane of your own, but not for hire or training, etc, These planes are simple, but still will require proper maintenance! The problem - some non mechanics I know can do a wonderful job of maintenance, others wouldn't know one end of a wrench from the other. There has to be some basic level of training, and 80 hours for a lot of people isn't enough.

Comment NO: 397	User Name: jwalters

NONONONONONONONONONONONONONO. DARNIT, I SHELLED OUT THOUSANDS TO BE ABLE TO WORK ON A/C, AS WELL AS HUNDREDS OF WORK PROFECIENCY HOURS..NO WAY NOT NO HOW, ONLY I COULD SEE IS IF THEY HELPED BUILD 51% OF THE PLANE AT THE FACTORY.

Comment NO: 403	User Name: wjwil

For some this would be fine but for others no.A written test along with a practical test plus the 80 hrs should be required.

Comment NO: 427	User Name: pat

no i have issued a comment tonight that stated this very fact. i suggested that if a person wanted to maintain and or inspect any and all aircraft that the certificate holder owned then tat would be ok. but if the intent of the regulation was to allow some one with only 80 hours of training to maintain and or inspect (with 16 hours additional for inspections) is unacceptable. i have over 4000 hours of formal training in all aspects of avation maintenance and i would still want more traing on light sport aircraft before i would try and maintain or inspect some one else a/c. an A&P should only be allowed to perform work for others.

Comment NO: 435	User Name: hawkul

What special light-sport aircraft? Going to be darn few of them due to over regulation and excessive costs. Did the FAA ever look at the ultralight training situation? Instructors build, modify, inspect and maintain their own planes with a great safety record both here and in Canada. In fact the record is better than in GA with all its rules and regulations. Why? Well the planes are extremely simple and easy to work on. Plus ultralight pilots and BFIs are well aware that they can die if they are stupid. Being responsible for yourself makes you pretty careful.

Comment NO: 436	User Name: slacker258

I am an A&P/IA and have worked over the years with several home builders.There are a lot of good individuals working out there.however this is the exception and not the rule.I feel the 80 hour requirement for each model and individual owns of his own and wants to repair/inspect would be a good requirement.However it should be restricted to aircraft he owns.I totally disagree with idea to allow an individual to repair or inspect an aircraft used for training or rental with only 80 hours of traning.

Comment NO: 452	User Name: hawkdrvr

No Comment

Comment NO: 460	User Name: Buford111

While 80 hours would probably be sufficient for strictly "remove and replace" maintenance actions, I believe a considerably higher standard should be established for engine overhauls and major airframe repairs.

Comment NO: 476	User Name: Steve

As an A&P /IA I do not belive this is enough training for a person to compleat inspections on a/c that are used for training or rental. Perhaps on an a/c owned by that individual for his own use.

Comment NO: 483	User Name: William G. macIntyre

Aircraft for training and rental should be maintained under current rules. The 80 hours should apply only to privately owned Sport Pilot aircraft.

Comment NO: 489	User Name: kepfordj

It's enough for your own plane, but not for rentals and training aircraft.

Comment NO: 521	User Name: Taylorcraft078

Open it up to include certificated planes that meet the rule similar to Canadian owner maint. It is getting hard to find an A&P that is competent to work on A65 powered rag and tube. Mine is very good but is approaching retirement. The value of my plane would drop if it went owner maint but the overall quality of maint would go up if I lost this guy.

Comment NO: 535	User Name: 12rick

Eighty hours is not enough time for many individuls to be trained to safely maintain a rental or training aircraft that may be flown by someone who might have very little knowledge of potentially dangerous mechanical issues.

Comment NO: 543	User Name: 584241

I hold an A&P/IA license. In my opinion, some people with the right syllabus and instructor could make it in 80 hours. Some would not get it in 800 hours. A written and oral exam would be necessary. The builder of a kit plane would be more likely to make a good mechanic or inspector. Personal opinions of the new 80 hour mechanic could be a problem. The experienced owner should have a method of appeal if there is a disagreement.

Comment NO: 546	User Name: Dan Bergstrom

I am an A&P mechanic and I am in agreement with the 80 hours of training for the repairmans certificate for light-sport planes. That level of training will allow an owner to do basic maintenance such as oil changes and minor repairs on his own plane. This proposal is really just like part FAR 41.13 appendix A (c) which allows the owner of a private plane to do preventive maintenance on their own aircraft. In real life, I don't think it is really going to be that big of an issue. Right now, people are allowed to work on their on cars, motorcycles, boat motors, snowmobiles and so on. Very few do, most will not even work on their own lawnmowers! In the long run I think the new light-sport planes will bring in more work to shops that are willing to open their door to them. The shop still get $60 bucks an hour whether it's a Beech Barron or a Kitfox.

Comment NO: 568	User Name: stewart

I agree with the proposal that 80 hours is enough. Candidates should be screened as to their knowledge of aircraft components, and basic mechanical knowledge before training to cull out people who dont have a clue. There is a BIG difference in this proposal and training an a/p or a/i.

Comment NO: 584	User Name: aeromac

No Comment

Comment NO: 587	User Name: goluscombe

I believe this is a quantum leap improvement over A/P requirements for our "standard" aircraft. I look at this as the equivalent of taking two quarters of class for machines that are, quite frankly, primitive compared to our cars and motorcycles. Again, I believe it will training to competency that will rule the quality of those graduating from training programs and if 80 hours turns out to be insufficient, industry will make the necessary adjustments.

Comment NO: 613	User Name: cec1155

I think 80 hours is fine. I think most of us that would try to get this certificate have been around a/c enough and are mechanically inclined to be qualified in 80 hours.

Comment NO: 639	User Name: jwg

I want to agree to all with all of this proposal, and to hope it goes through without the delay inevitble with modification. But I have doubts about this part of it. Training and experience requirements for maintaining one's own aircraft are sufficient. For Rental or Training planes I would like to see, in addition to 80 hours of training, some type of qualifying examination. That is entirely in the interest of public safety. On the other hand, I would absolutely not like to see stringent maintenance requirements if an owner hires and instructor willing to check out the owner in the owner's airplane.

Comment NO: 646	User Name: towpilot

80 hours should be enough to get a repairman started on Sport aircraft but certainly not for standard certificated aircraft that will fall into the Sport category such as the J-3 Cub or the Aeronca Champ. I think that a provision should be made that disallows a Sport Aircraft Repairman to work on standard class light aircraft without an A&P license, even though such an aircraft is technically within the weight limits of the Light Sport category. There is a great deal of difference in the complexity of a Quicksilver and a J-3 Cub and a great deal of difference in the skill required to maintain them.

Comment NO: 656	User Name: glaunt

Hmmmm...this may be excessive for the simpler models..and may be excessive for the more complicated systems. I think that most of the apllicants will be experienced personnel from existing FBO's I'm thinking htat 40 hrs would be more appropriate.

Comment NO: 710	User Name: Steve

I do not think this is a good idea for training or rental. To little time

Comment NO: 734	User Name: Wayne McIntosh

If these aircraft are truly simple 1 and 2 place aircraft with simple 2 cycle or 4 cycle engines without the requirement of retractable landing gear, lights, or IFR instrument systems then 80 hours will be enough time to train a repairman.

Comment NO: 757	User Name: jrhorsley

I think this requirement should be appropriate

Comment NO: 773	User Name: Rich Wallin

Yes, I agree. There is a big difference between working on a Champ and a Mooney. Eighty hours should be sufficent, but there should be a test.

Comment NO: 780	User Name: mccoy3

Yes, simple, light-sport aircraft should be able to be maintained by persons with this level of training.

Comment NO: 792	User Name: airgus

If this means that just anybody could sit through a 2 week classs and call him/herself an aircraft repairman I would not want to get in a rental sport airplane. A minimum of 80 hours plus a written and oral exam and recurrency training sounds better.

Comment NO: 804	User Name: jfaithbass

This rule would be great if it was added to the homebuilt / experimental rules that exist now. I agree with getting a repairman certificate after building a plane from a kit or plans, and that you are only allowed to work on your own plane. Not a plane that can be rented or working on another persons plane for hire, keep it like experimental is now. A&P/IA's have done a lot of work and training to be allowed to work on aircraft. Tell the public that anyone can set through a two week class and work on airplanes and our,the A&P/IA's, credit just went down the tubes. We,the A&P/IA's are already underpaid and looked at as "unskilled labor" and this will not make things better. The FAA proposed rule to make us "maintenance technitions" dissappeared now they want to allow a person who has two weeks of training do the same job we had to have two years or more of training for. As long as sport pilot repairman are only allowed to work on the planes they build, and it is not done on a plane that is for hire than its a great idea .

Comment NO: 809	User Name: flightconn

80 Hours does not seem adaquate to train someone to repair/inspect aircraft used for hire or Rental

Comment NO: 830	User Name: gkrug

Obviously, this agreement is based-upon the quality of the instruction with the training being offered nationwide and often.

Comment NO: 849	User Name: johnckircher

Who knows? The FAA? When will the FAA decide that it must require an apprenticship of 5 years to change the oil on a rotax engine? I mean, after all, if we can save even ONE LIFE by driving up the costs of owning and maintaining a small aircraft to the point where it drives thousands of people out of the sport, and makes it available only to the wealthy, isn't it worth the cost? NO!

Comment NO: 873	User Name: windele

I believe that this will be very difficult to monitor. We need to make the number of hours more reasonable (40) and make a larger share of the hours around engine maintenance. Engines problems will be the primary reason for incidents.

Comment NO: 879	User Name: whiteman

80 hrs may be enough for initial training with some machanical backgroung. In my conversations with instructors that teach in university setings I have been given the understanding that the quality of entry level students over the past few years has droped. So, there may be some value in reviewing previous experance and training accordingly. In another vein, what are the recurring training requirements?

Comment NO: 880	User Name: frjn33

This provision has some merit, but it also needs some kind of "grandfathering clause." For those who have been repairing ultralights (fat or not 0 and ultralight trainers for years, this would be an unfair burden. Many of the A&P's I have met over the years will not work on an ultralight, because they do not know anything about 2 cycle engines. That's what they say, at least. Today's ultralight will probably be tomorrow's sport plane, if what FAA hopes happens does happen. The mechanics who have worked on ultralights for years could probably teach these classes. Why should they be required to pay for and sit through them? For the rest of us who are not that experienced, yes, an 80-hour class is reasonable. The ones who have commented that it would not be enough are thinking with a GA mentality. Most of the aircraft in the potential fleet are simple Quicksilvers! How do I know? Because they sold the most over the years. It's a different world maintaining a simple flying machine like a Quicksilver and maintaining Cessna.

Comment NO: 895	User Name: Spdrflyr

This is cool. I don't have any problem with this one...even though I built my plane from scrap parts and NOBODY knows her better than I do. Now I need to go to a school to learn how to fix her...oh well!

Comment NO: 902	User Name: tbrandt

Yes and we may want to consider some sort of continuing education (like flight reviews but on a longer cycle-5 years?) or voluntary like the Wings programs for pilots and technicians. I expect evolution in aircraft, materials and procedures over that amount of time.

Comment NO: 917	User Name: Gator

I believe I could learn in 80 hours. I agree with frjn33 concerning the grandfather clause.

Comment NO: 954	User Name: SoccerPilot

Those who built their own planes for training know their planes best. The instustors I know use ONLY certified Rotax repairmen to work on their engines now.

Comment NO: 960	User Name: dfreeman

Providing that the 80 hours of training is either provided by the specific aircraft manufacturer, approved by the manufacturer, or includes training on the various methods of construction and repair as indicated by the “consensus standards”. What I wouldn’t like to see happen is an FAA governed program that provided for “parts replacement” only as the cost of owning and operating a “special light sport aircraft” would become cost prohibitive.

Comment NO: 985	User Name: kcmalls

80 hours will be appropriate for simple aircraft. ROTAX will certify engine repair after a 3 day course now.

Comment NO: 987	User Name: Ro

I Think it depends on the type of training the person has had. Starting from scrach-80 hrs No! If you built your own plane then 80 hours would be OK on that type. However on sports aircraft in general 80 hours is only two weeks. I don't think so.

Comment NO: 996	User Name: Terry Davis

No Comment

Comment NO: 1004	User Name: johnhenderson

It is interesting that a person would need 80 hours for a sport aircaft when an A&P mechanic needs 40 hours of fam training to work on big airplanes. I would like to see a combination of class room hours and supervised work expererience before a person can perform work on aircraft for hire -- perhaps 40 hours of class room and 40 hours of work and 3 inspection for example.

Comment NO: 1023	User Name: tebrahim

I agree,for these simple airplanes,I think 80 hours is enough with written/oral exams at the end.We do need a lot of sport aircraft repairmen out there,lets face it,how many A&P's really know ultralights or for that matter rag & tube airplanes,unless they have a lot of gray hair or have built airplanes themselves

Comment NO: 1029	User Name: Robert

80 Hours seems Excessive and would financially limit number of Repairmen, especially if cross country Traveling for a particular make and model is required."TYPE" Training seems appropiate.

Comment NO: 1036	User Name: RFI

I disagree for most aircraft/gyroplanes. 80 hours is excessive for simple aircraft, especially gyroplanes. 40 hours would be more reasonable.

Comment NO: 1055	User Name: terryo

These simple machines could be properly maintained/repaired with less than 40 hours by a person with average mechanical skills.

Comment NO: 1085	User Name: Gyroman

No Comment

Comment NO: 1088	User Name: Flymo

Much depends on the basic skills of the individual, but in general it is probably excessive due to the very simplicity of the aircraft in general and gyros in particular.

Comment NO: 1111	User Name: fatplane

I don't know how anyone can make a judgement on the number "80". Is this for wood and fabric aircraft? Does it include the full spectrum of two and four-stroke engines that will be used in these aircraft? Here again, there will be many types of aircraft involved. Or is this training for only one model?

Comment NO: 1140	User Name: 21214

First off, if I am the builder of the aircraft, then I likely have far more than 80 hours "training" in maintaining my aircraft. So all this does is add more paperwork and more government involvment. Let CFI's training under the current exemptions do their own work on their own machines.

Comment NO: 1142	User Name: rotopup

I teach at a 147 school. I can't imagine any of my students being qualified to maintain a training aircraft of any kind with only 80 hrs. of training. It largely depends on individual skills and background so I think the requirement should be the ability to pass an oral and practical exam on the subject aircraft (without a specific hour-training requirement)

Comment NO: 1176	User Name: jonvee

Only if you are not the builder of the aircraft.

Comment NO: 1182	User Name: heronium

I could build a jet in 80 hrs. 40 hrs is more than needed

Comment NO: 1217	User Name: PWPlack

The current repairman eligibility for builders of individual aircraft should also be continued. A thorough knowledge test should supercede a specific length of training for others.

Comment NO: 1225	User Name: gyrobee

No Comment

Comment NO: 1227	User Name: helitim

No Comment

Comment NO: 1266	User Name: skiptyler

No Comment

Comment NO: 1316	User Name: lsippell

The current repairman eligibility for builders of individual aircraft should be continued. But I believe any aircraft rented out should be maintained by a certificated A&P.

Comment NO: 1332	User Name: RTHOMPSON

This is a very good plan. Certified repairmen under todays rules are very hard to find in some areas and may have little knowlegde of light aircraft. My expericence has been that people involved in ultralights and experimentals know their aircraft and the maintinace requirements as least as well as general A&P in the type of aircraft they work on.

Comment NO: 1375	User Name: dhansen

No Comment

Comment NO: 1410	User Name: humair14

No Comment

Comment NO: 1419	User Name: RichJennings

If the aircraft in question is for rental use or training use, then of course some method of controlling inspection(s) should be used. An "inspector or repairman" of light-sport aircraft, if being paid to perform such inspections, should prove that they possess the experience to properly sign-off such planes. If an 80 hour course would be sufficient to qualify that person, then so be it. Additional and/or supplimental credit for knowledge should be granted a person if they can show proof of prior knowledge about certain aircraft they might inspect (meaning they have built and flown the aircraft model and/or type they are inspecting/maintaining).

Comment NO: 1443	User Name: KendallDucote

In fixed wing aircraft, I don't know. In a PPC, this is ludicrous.

Comment NO: 1463	User Name: llhoedl

An aircraft used for rental and training, Should be maintained, by a Certificated Aircraft and Powerplant Mechanic

Comment NO: 1468	User Name: Parris

It is sufficient

Comment NO: 1473	User Name: sleepy

Again, I don't think this fits the PPC and weight shift class. This will induce more cost. It is an issue that probably must be addressed in regards to rentals and training.

Comment NO: 1477	User Name: potentialpilot

If you've built an aircraft, you should be able to maintain it, just like experimentals are now. But just because someone has not had several week's worth of classroom training doesn't mean they're clueless, nor does having training ensure they know what they're doing. I think some kind of practical test is a better idea. If you have the experience already, great, if not, you can still take a class or have someone with experience teach you. Planes used for *commercial* training (as opposed to teaching a friend to fly on a non-commercial personal basis, or learning to fly in your own aircraft) should be separated from John Q. Public who's just out for fun and flying around with their friends. In the many cases where a small company exists and teh owners or staff built the plane, they should have the authority to maintain their aircraft, even if it's used for training or demo rides on a commercial basis. I agree with jfaithbass's comments, if you've been trained and have experience as an A&P you're going to have experience that a 2-week course taker won't have. A practical experience test would allow them to use this experience, and if it is well designed then it shouldn't allow the clueless to pass until they learn the important things they really need to know.

Comment NO: 1520	User Name: bjmoore

Agree and find this to be an attractive part of the rule. However, I feel 80 hours is excessive. 16 hour is about right and I see no reason for creating two different repairman certifcates for these simple aircraft. There should be an alternative capability for those who already own and have been operating and maintaining their aircraft for years to be issued a waiver or exception to this requirment on the aircraft they are currently flying.

Comment NO: 1541	User Name: Bill Bardin

In my case, it is inappropriate, since I have been building, repairing, maintaining my flight school and private ultralight aircraft for over 14 years. We've had to fix the mistakes of FAA-approved A&P mechanics many times. It may well apply to new people coming into the sport, but 80 hours seems excessive, except in the case of aircraft which fly more than 100 mph.

Comment NO: 1569	User Name: ultraj51

This is appropriate if the person has prior experience ?

Comment NO: 1593	User Name: harveyking

I agree

Comment NO: 1602	User Name: davidbauch

This is a catch 22. No one can learn all that is required to repair and maintain all of the myriads of engines and airframe types that would be used in LSA in 80 hours. However, 80 hours would be adequate if it were limited to type, say Powered Parachutes using Rotax 2-cycle engines.

Comment NO: 1627	User Name: JSTO1

Setting specific number of hours appears to be arbitrary. Establishing a set of knowledge criteria for a repairman certificate is appropriate. A formal test process is needed. Existing experience should be credited for up to half of the required time. The remainder should focus on the category/type of aircraft and not be limited to make and model. A web based test process should be mandated to made the cost and need for travel minimal, along with allowing the process to be tracked and improved on based on the results achieved. For aircraft in rental and public training environments a regular A&P/IA should do an inspection every 2 years to audit quality levels. Builders of the aircraft should take the same tests without additional time constraints.

Comment NO: 1633	User Name: live2av8

NO, because it'll likely be far too expensive and won't reap adequate benefits over and above what current day ultralighters utilize to achieve their amazing safety record. I state likely because nobody seems to know what it'll entail. Specific details about it haven't been answered yet. Such as where would people have to travel to? How much will the seminars cost? Would we have to be a member of the sponsoring organization, such as EAA? I could never endorse it until specific details are released. -live2av8-

Comment NO: 1634	User Name: bliddel

Yes, 80 hours is enough. These are simple aircraft. There is no glass cockpit, no turbocharger, no retractible gear, etc.

Comment NO: 1658	User Name: TOMS

I think ther should be some kind of pratical test. Just because you were taking instruction for 80 hours dosen't mean you can inspect or repair an aircraft.

Comment NO: 1681	User Name: john brady

I think that 80 hrs should be enough training only if there is some additional experience beforehand that can be vwerified such as building a kit airplane or someone that may have attended some type of trade school for aviation. Work experience with A&P should work also.

Comment NO: 1694	User Name: dschach

80 hrs is more than enough for weight shift and powered parachutes. An individual can build one of these aircraft in that amount of time. This proposal allows an individual to purchase a fully assembled aircraft and gain the same experience from a course. Right now there are extremely few A&P mechanics who are knowledgable about weight shift and powered parachutes. This includes knowledge about tube and fabric construction and Rotax 2 stroke engines. Many A&P's won't touch anything unless it's a certified aircraft with a Lycoming or Continental engine. A&P's without ultralight experience who want to work on weight shift and powered parachutes should be required to take this course as well.

Comment NO: 1712	User Name: Pam

80 hours to work on a 2-cycle engine or bolt-together-frames???? one of the joys of flying PPCs is the simplicity of maintenance of your own machine--- now I will have to go take 80 hours of training from and FAA person who has never seen a PPC let alon worked on one?

Comment NO: 1724	User Name: RobertBaginski

Aircraft used for rental and training, Should be maintained, by a certificated repairman and /or Aircraft and Powerplant Mechanic and the aircraft certified by an Inspection authory, or Airframe & Powerplant Mechanic, or Certificated Repairman as air worthy at 2-year intervals with a progressive Inspection program. The time of training for the repairman cert.'s is important and training would have to be documented thus no time of hours spent in training. However the complexity of all systems in the field is over-welling to have full knowledge of all systems of all types thus leading to repairmen that has the required knowledge of the type being worked to be certified like repairman at repair stations were. R.Baginski

Comment NO: 1754	User Name: BigSkyAviation

What is broken in the current 103 training exemption system? These light planes are maintained / modified by the owners with a very good safety record. Factory built planes should be maintained under the current A&P / IA system. If nothing else a person should be able to be rated as an A&P under a system which is easier to be certified than the current system. Fix what is broken. The only thing wrong now is that it is difficult to get rated as a A&P.

Comment NO: 1767	User Name: edburkhead

It seems reasonable. Please consider a lower number of hours for a particular make/model if the repairman has graduated from a training course given by, or authorized by, the manufacturer or type club.

Comment NO: 1783	User Name: fnad

I live in the Alaskan bush. First. It would cost me $850 each way to fly in an inspector to check my rig. there's no roads out here. Then I would have to pay him. You are talking around $2,000 to inspect my rig. And what if I need parts from town? Does the inspector hang around a week while they arrive to check them off? I could go to town and take the course. Over $1,500 in travel, hotels, meals and course cost. If there has to be an inspection, it should be by category and class, and give me a break 80 hours! A 2 hour video with a quiz at the end is enough. We would be checking bolts, cracks, chutes, engine mounts etc, not designing a new model. Do you think we try to crash or be stupid? Make the info available and folks will leap on it. No one wants to go down, particularly out here. I fly lots in sub-zer temps. Someone needs a reality check.

Comment NO: 1788	User Name: steve.stefanic

I agree conditionally; the condition being that a person totally unfamiliar with engines & engine repair is not going to be a qualified repairman in 80 hours. If the person has done some engine repair at home, successfully setting valves, cleaning dirty heads, timing, grinding valves, torqueing fasteners, etc., then that person is probably far ahead of the new-comer & could probably be qualified in less than 80 hours. In-experienced persons need more "shop" training than "book" training; their training should be appropriately longer-maybe 10 more hours? Base it upon an entry skill level determined by simple questions as to what they know about engines & how much they have worked on them. Let them train 40 hours & take a theoretical test; if they don't pass, then require the 80 hours.

Comment NO: 1801	User Name: gldrboy

Specifying training time is the wrong way to do it! Require a practical and written test, just like a pilot's license. For some joker who has never rebuilt an engine, 80 hours is not enough. For someone else who has been working on machines his whole life, and is familiar with aircraft techniques, 80 hours is a waste of time. Rewrite and expand AC 43.13 so it would have more applicabilty to all aircraft, and a novice could use it as the fundamental base of knowledge required. It's a good publication, but it needs expanding.

Comment NO: 1811	User Name: snyd1437

Rather than a blanket 80-hour rule I think it would be better to have the manufacturers work with the FAA to come up with an approved training syllabus. The amount of training needed to perform repairs varies greatly from category to category of light-sport aircraft. For example, 80 hours may be sufficient for conventional fixed-wing aircraft, but may be excessive for a powered parachute.

Comment NO: 1826	User Name: megamouse

Depends on specific aircraft make & model, but in general the sport aircraft are simple, coupled with passing an appropriated test, 80 hrs training should be sufficient. What is needed is to establish appropriate test standards.

Comment NO: 1832	User Name: kpcp

The length of training is dependent upon the effectiveness of the given training and the receptiveness of the individual student. FAA & Industry should monitor the results of training and "adjust" the content, delivery, and duration to meet the needs of the norm of the population.

Question Number 7 - In the proposed definition of "light-sport aircraft," the FAA limited the speed to 115 knots in straight and level flight at maximum continuous engine power (VH). The FAA proposed this because VH is a measure of the speed and power (or kinetic energy) of the aircraft, and it is relatively easy to measure. Do you believe the FAA should consider a different method of limiting the kinetic energy of a light-sport aircraft? Why or Why not? What alternative would you propose?

(7) In the proposed definition of "light-sport aircraft," the FAA limited the speed to 115 knots in straight and level flight at maximum continuous engine power (VH). The FAA proposed this because VH is a measure of the speed and power (or kinetic energy) of the aircraft, and it is relatively easy to measure. Do you believe the FAA should consider a different method of limiting the kinetic energy of a light-sport aircraft? Why or Why not? What alternative would you propose?

Visited: 377	Total Comments: 124	Last Post: 5/6/02

Comment NO: 29 **User Name: delta2ul**

I would suggest that clean stall speed would be a more practical limiting factor. Respected designers have commented in the media that clean stall will automatically limit top speed. Clean stall (w/o flaps, slats or other controllable lift enhancing devices) precludes the use of elaborate lift enhancing systems. Free the designers to produce the most efficient designs possible. The weight (and therefore mass) limit will control the kinetic energy produced within the limits imposed by the clean stall speed.

Comment NO: 53 **User Name: capella1**

We believe the Vh limitation of 115kts is appropriate for this category of operations and parallels the performance characteristics of other similar categories worldwide. We also believe it unlikely that aircraft within this weight category will likely exceed this Vh limitation while also adhering to the Vso limitation. We find no less complex means of limiting the kinetic energy of these aircraft than as proposed, though we object to the need for the VS1 limitation in addition to the Vh limitation as being overly restrictive and redundant. Similar categories worldwide have no such VS1 limitation.

Comment NO: 58 **User Name: cbranagh**

If kinetic energy is what you're trying to limit then the weight(mass) needs to be considered. Why not a combined criteria of speed and weight as a limiting number?

Comment NO: 68 **User Name: flyfree**

Sure. Set a max stall speed. Then the top speed will take care of itself without curbing the desire to create new aircraft.

Comment NO: 83 **User Name: Bradley**

No Comment

Comment NO: 98 **User Name: artspain**

I agree for all of the reasons oulined in the proposal.

Comment NO: 110 **User Name: Bill Cartwright**

Stall and top speed is good enough for this rule. No changes, we agree.

Comment NO: 124 **User Name: w1bfn**

Consider max continuous power: The Jabiru engine for instance, will produce 120 HP for a short time, but is suggested to run at 105 HP continuously. Clean Stall at gross weight is probably an easier measurement to make, and will/should accomplish your desired end.

Comment NO: 141	User Name: daberti

If also calculated at gross weight to take one more factor out of the mysterious speed claims leveled by manufacturers.

Comment NO: 158	User Name: barnesrc

The proposed rule has two very definitive measures, top speed and stall speed. Both of these speeds adequately define the flight envelope for an aircraft and should work just fine for this propsed rule.

Comment NO: 174	User Name: Ultraliteteacher

The speed limit does little towards true safety, nor impact energy in an uncontrolled situation. Terminal velocity and mass are the only factors here. How SLOW you can go is far more important. Keep 39 knots stall and drop the speed limit. Landing speed and subsequent roll out is where speed has meaning. A supersonic jet, having broken up in flight, will hit as hard per pound as the passenger compartment of a 2 place trainer from 5000'. Without thrust and without airfoils, a brick drops like a brick.

Comment NO: 198	User Name: sthomason

Yes. I propose that the clean stall speed and landing-configuration stall speed be the only speed limiting design criteria. This will reduce the risk during the most critical point in aircraft operations - Landing, takeoff, and off-field landings. Limiting cruise speed is redundant. Let's face it, very few of the proposed designs will be very fast, and those that are abnormally fast will not be commercially successful due to compromised designs, cramped cockpits, expense, and legal liabilities. If a level VH speed is proposed, it should be at 75% power (usual cruise speed).

Comment NO: 214	User Name: Batson

The FAA did a great job of limiting the kenetic energy of the proposed aircraft. Its very appropriate. I was always concerned with the 254 pound limit on ultralight. Safety was often compromised for weight savings. The energy of the proposed aircraft is similar to a Harley Davidson motorcycle with two people aboard. The new aircraft pose little threat to any structures on the ground.

Comment NO: 242	User Name: sheintz

While including the max. speed may not be required with the two separate stall speed definitions, I think it should remain: LSA's will continue to be simple and non-complex aircraft, and designers can concentrate on the handling characteristics of their aircraft.

Comment NO: 244	User Name: Dennis

The kinetic energy arguement is arbitrary and defies logic. We shouldn't have restrictions on operating parameters that cannot logically and emperialistically prove that improved safety is an end result.

Comment NO: 257	User Name: nleggett

Speed and mass determine the kinetic energy of an object. Speed is the dominant factor, so this rule is reasonable. Nick Leggett, Private Pilot

Comment NO: 267	User Name: dalemseitzer

I think the emty weight and stall speed are the best measures. Sport Planes are not intended to be cross country luxury planes with auto pilot and IFR instruments--they should be short take off and landing planes that are rugged and protect the pilot in case of emergencies.

Comment NO: 316	User Name: SunKissed

this speed restriction may cause problems for sport planes used in class b arspace

Comment NO: 332	User Name: sbreeden

I own a 1946 Cessna 140 and would like this aircraft model to be included in the "light sport aircraft" definition. This would require the max takeoff weight limit to be extended to 1450 pounds.

Comment NO: 337	User Name: garyo

I suggest that clean stall speed would be a more practical limiting factor. Vh is redundent and restrictive and limits posible future enhancements. The most important limitation is the wieght and VS1. The rest will take care of themselves.

Comment NO: 356	User Name: jwalters

YES. CONSIDER A DIFFERANT MEASURE. 115KTS IN A THREE TON A/C IS ALOT REMOVED FROM A 1/2 TON A/C. THE MATH IS SIMPLE, EVEN MY BONE STOCK 152II WILL DO 123KTS IN THE RIGHT CONDITIONS, IT HAS TO BE A LEVEL PLAYING FIELD.

Comment NO: 367	User Name: johnclay

There needs to be some dividing line and kinetic energy seems reasonable. If so it would seem to make more sense to define the rule in terms of kinetic eregy (mass times velocity squared) rather than setting a max weight and a max speed. That may allow for designers and owners to trade weight for speed or vice versa. Such a limit would allow for more aircraft that are currently certificated and are heavier (and hence could not qualify due to weight) but are slower to qualify as light sport aircraft. However the final rule is published I hope that it will be simple and not involve lots of different limits (stall speed, horsepower, VH, and max weight). I would rather see a simple rule, making it easy to determine if an aircraft qualifies as light sport.

Comment NO: 393	User Name: bobkat

Probably stall speed and weight are more appropriate. The max speed may be a bit low for some people, but the important thing is the stall speed and weight. The gross weight of the plane and its stall speed would be more appropriate to look at than the maximum speed. Say, anything below a basic 150 trainer's kinetic energy would be legal. This would open up a lot of low and slow basic trainers that are currently outlawed by the 1232 pound rule.

Comment NO: 404	User Name: wjwil

It is clear that the person that made this proposal is not a pilot.An aircraft flying in the air may have an indicated airspeed of 115 kts.,but depending on the wind the aircraft might have a 20kt tail wind which would generate a 135kt ground speed,like wise the same plane could have a 20kt head wind and would have a ground speed of 95kts.Set a max. horsepower of 150 hp which is ample to power any 2 seat aircraft and still be a rather simple aircraft.To make it much easier to understand which aircraft would be safer flying from a 1500 ft runway a 65hp Champ or a 150hp Champ.

Comment NO: 421	User Name: ch900

I disagree but strongly agree with the limitation of kinetic energy during take off and landing. This is a matter of safety. In the intermountain west we may fly at high altitudes and high tempertures even when around the patch. As the engines are normally aspirated only, we need all the horsepower we can get to operate safely. Use of VH as proposed will result in an unsafe aircraft that is horsepower deficient for high altitude and high temperature operation. We need to take-off slow, and land slow. Set an upper HP limit (say 150) and concentrate on clean and dirty stall stall requirements. The rest will take care of itself.

Comment NO: 438	User Name: hawkul

Why is there no consideration of the amount of gasoline on board in case of a crash in the middle of a city? Does that mean there is no reason to limit ultralights (which fly in non congested areas) to 5 gallons? Top speeds and stall speeds should match the figures for cesnas and simular planes.

Comment NO: 453	User Name: hawkdrvr

No Comment

Comment NO: 456	User Name: capella1

We are opposed to the VS1 limitation of 44kts. We believe the intent of FAA was to apply the VS1

limitation specified to only those aircraft that are equipped with lift-enhancing devices, as a method of limiting minimum wing area and drag and thereby limiting maximum achievable speed, but this is not particularly clear as written in the NPRM. No light sport aircraft, whether or not equipped with lift enhancing devices, should have a higher stalling speed when in the landing configuration than the VSO limitation of 39kts, if low landing speeds are the goal as stated in the NPRM. Basing the performance envelope on wing loading theories addresses only one aspect of the drag profile exhibited by an aircraft, and does not necessarily result in the top speed limitations being discussed here when horsepower remains variable. VS1 is therefore ineffective in limiting top speed and kinetic energy. The intent here is to define the performance envelope of the aircraft category. VS1 is redundant, results in uneccessary design constraints, is ineffective at limiting top speed, and has nothing to do with landing speeds. VS1 is therefore not needed and should be eliminated from the definition. VSO Establishes landing speeds. VH establishes maximum speeds. VH combined with the maximum takeoff weight establishes maximum kinetic energy.

Comment NO: 467	**User Name:** Dave Jackson

The primary objective for 'Light Sport Aircraft' is safety. I do not believe that with aircraft 'speed kills'. Setting a maximum speed will be detrimental to the development and advancement of US made light aircraft.

Comment NO: 477	**User Name:** Steve

Keep It Simple

Comment NO: 485	**User Name:** W6KOW

I agree with the VH method of limiting kinetic energy.

Comment NO: 491	**User Name:** kepfordj

works for me.

Comment NO: 496	**User Name:** William G. macIntyre

Kinetic energy equals one half the product of the mass and the square of the velocity. Considering the well established mass required for a safe aircraft structure, the only variable you CAN control to produce the desired kinetic energy is velocity. Simple physics Mr. Newton! THIS COMMENT SAYS NOTHING REGARDING THE WISDOM OF YOUR CHOSEN KINETIC ENERGY LIMIT VALUE , WHICH APPEARS TO ME A BIT LOW TO PROVIDE SPORT AIRCRAFT STRUCTURAL SAFETY AND ENGINE RELIABILITY (as met for example by the Citabria wirh 0235 Lycoming engine)!

Comment NO: 515	**User Name:** cubflyer

I feel that the restriction should be a 150 hp maximum engine size and a fixed stall speed of 39 knots or less . The other factors would take care of themselves without unnecessary restrictions and would pose no increase of risk to people or property on the ground . This would also increase the fleet of existing "low and slow" certified and homebuilt aircraft available to the Sport Pilot .

Comment NO: 520	**User Name:** Taylorcraft078

The proposal is confusing as to the number used for the 115kts. The reword in this question is much clearer. Total kinetic energy is not all that important - dead is dead. Take off and landing speeds are more important as most of the problems will be close to the ground. Stall is a good measure to keep in place. The proposed number is easy to hit in many planes.

Comment NO: 544	**User Name:** 584241

Since kinetic energy is a function of mass and velovity, why penalize a good designer who can design a light, efficient plane that is faster than 115kts? The only time kinetic energy is critical is when approaching the crash site.

Comment NO: 556	User Name: seaplaneguy

As a designer of seaplanes, the proposed 115 kts speed limit would restrict American advancements where the industry needs it most. The current technology limits the ratio of VA (cruise)/VS ("stall" with flaps) to around 2-3:1 or so. To make the industry viable for the general public, that ratio needs to be greater than 5:1, or in other words a "stall" of 40 mph and cruise of 200 mph. If an airplane can land with flaps at 40-45 mph it will be able to land off field safely most of the time provided there is post stall controllability and the landing gear is designed properly with large enough tires. The key to American aviation viability is to have useful pieces of transportation equipment that anyone can learn to fly quickly and safely. The ability of entrepreneurs to raise capital for light airplanes is very limited because of the cost of certification and the lack of customers. Sport airplanes as envisioned does help in attracting more pilots, but little to enhance the commercial viability of airplane products because the 115 kts limitation focuses attention exactly where the sky should be the limit. Would the government propose limiting a computer chip speed? NO! Neither should it limit an airplanes top speed. If there were NO SPEED LIMIT, the technological advancements would make the industry viable, and would give the American industry an ADVANTAGE over all the rest of the world. If there were NO speed restriction in part 103, for example, the Ultralight industry would have evolved much different than today, with innovation in technology that would lead to safe landing speeds and useful pieces of equipment, and not just remakes of 70-year-old wing/flap designs. Another major reason the industry is dead is because the products are only 2 times as fast as cars with a 45 mph "stall", and the risks and costs far outweigh the benefits. If you recall, NASA has stated that a 200+ mph cruise is needed to make light airplanes competitive with airliners as transportation. Any speed limit should only be due to structural limitations that cause flutter. If an airplane breaks up in the air it will likely hit the ground just as fast if it cruised at 125mph as it would if it curised at 200mph, so limiting speed makes no sense at all. This 115 kts speed limit is a perfect example where government regulation will cost lives and damage an industry. At high altitudes where I live, power is very important for safety, especially on a hot day around 10,000 ft peaks. The power should be at least 75-90 hp per person, or 180 hp for a two-place airplane. To make an airplane fly as slow as 132 mph on 150-180 hp would require cruise power restrictions by some electronic means, or a completely obsolete and draggy airplane design. We have hundreds of Piper Cub remakes and the industry is still dead. Why? They are slow! We do not need MORE old and draggy designs.

Comment NO: 569	User Name: stewart

I believe that the stall speed is ok, but drop the top speed. It has no revelence, terminal velocity is the same no matter what the object weighs.

Comment NO: 586	User Name: aeromac

The stall speeds should be limited. Why limit the kinetic energy? This would make density altitude on take off and landing a bigger problem than it has to be. Keep it safe & simple!

Comment NO: 589	User Name: goluscombe

I agree. This is a sport pilot proposal. If other are looking for greater utility, then we still have the standards in place today. I do hope that new flying public will prove themselves to be safe enough to expand on these on these limitations. I believe this is great starting place that will provide the public with new opportunities never before seen.

Comment NO: 614	User Name: cec1155

Sounds good.

Comment NO: 627	User Name: Dennis Estenson

Remove the weight limit! How many people on the ground are hurt or killed by light plane crashes?

Comment NO: 632	User Name: jaybray56

There should not be a limit for straight and level flight. Vso is the most important factor for safety. The discussion about kinetic energy at Vh does not define anything relating to safety. Please drop the Vh sppeed limit. Thanks for all your work expended to make this proposed rule a reality! I have a new design that would comply with Sport Pilot rule beautifully, except for the Vh speed limit. Sincerely, Jay Braymer Gardner, KS

Comment NO: 637	User Name: slowflyer

In the name of Sport Pilot, the FAA is creating a new certificate for Light Sport Aircraft. Part of this rule is to limit the SPEED and WEIGHT of these aircraft for public safety. GA pilots want more weight, ultralight pilots want less weight. In terms of this proposal (kinetic energy dissipated in the event of a crash), which type of aircraft would carry LESS risk to the public? The FAA cannot cover such a wide spectrum of aircraft. Yes, make the Sport Pilot certificate for heavier aircraft (and this could be a modified version of the recreational certificate) BUT also create a certificate for FAT ULTRALIGHTS only. What is a fat ultralight? It's a light plane that weighs more than 254 lbs and less than 500 lbs empty, usually powered by a 2-stroke engine, and flies less than 80 mph in level flight. They come in the form of a trike, powered parachute (ppc), or fixed-wing. Do any of these planes sound like a 1200 lb (or more) aircraft that flies at 130 mph or so? I don't think so. So why is the FAA trying to include fat ultralights into a proposal like this?

Comment NO: 640	User Name: jwg

The limit is arbitrary, but so is the definition of 'Sport pilot' and 'sport plane'. I cannot argue with a speed limit (or kinetic energy limit if you prefer) for aircraft in this class. There are other types of aircraft (experimental and certificated) for those who may want to go faster. In a way it is a shame, as constantly improving technology offers the potential for very fast and efficient aircraft. Including them in this category would probably stimulate development. But it would not be appropriate with the stated purpose (sport flying) and limited training required by this proposal.

Comment NO: 647	User Name: piper

Why limit the weight to 1232 and not something like 1500lbs this would include more of vintage two place aircraft. After all a two place is a two place,you will still have limits on stall speeds and max cruise speed anyway. This will open more aircraft into this area that already are flying and are more afordable to buy. We all know that new aircraft that fit into this area will not be low in price.

Comment NO: 657	User Name: glaunt

this seems straight forward. Wing loading might be a good determination of total energy..given a gross wt limit.

Comment NO: 676	User Name: creilly

I would like the weight limit removed would give access to a lot more certified airplanes while still meeting all other criteria. Thanks Charlie Reilly

Comment NO: 693	User Name: mccoy3

I think limiting the kinetic energy at takeo0ff and landing as proposed is sufficient. These operations are where accidents happen. The VH speeds seem arbitary.

Comment NO: 711	User Name: Steve

I agree for the most part. It would be nice if it were just a bit higher to include a/c like c-120, c-140 even c-150. There would many more proven a/c available.

Comment NO: 729	User Name: FlyDiver

As written, a maximum speed limit eliminates a rather large number of aircraft that in all other respects would become LSA. Additionally, this kind of limit puts a lid on research and development to improve aircraft performance. A maximum stall speed and maximum weight is all that is needed. The laws of aerodynamics will provide the maximum speed limit. For safety, require sufficient altitude to avoid structures and people in the event of engine out.

Comment NO: 735	User Name: Wayne McIntosh

If Kinetic energy is why 1232 pounds and 115 knots were picked then why not change to 1332 pounds and 107 knots. That way more currently certified aircraft would qualify and the same kinetic energy would apply. The important thing is to make it so as many simple to fly sport type aircraft as possible are available so more people will be attracted to Sport Pilot.

Comment NO: 739	User Name: towpilot

This is reasonable just as it is. "Commanded Kinetic Energy"(CKE)and the exponential increase in damage potential as CKE increases is one of the main reasons (maybe the ultimate reason)for complex, high horsepower endorsements and type ratings. We saw one CKE line drawn with Part 103 and that line challenged, resulting in Sport Pilot. With the proposed limits now covering some light aircraft that currently require an FAA pilot certificate I doubt that the FAA can go much further without just scrapping the Sport Pilot classification altogether and simply insisting that everyone become a certificated, medical holding pilot. Since mass and velocity are the two components of kinetic energy I think the limitations are quite reasonable and accurately assigned. If anyone wants to command more kinetic energy than proposed, they should get at least a private pilot certificate.

Comment NO: 760	User Name: jrhorsley

I would like to see the weight limit raised to give access to more planes now available.

Comment NO: 774	User Name: Rich Wallin

This test should be OK

Comment NO: 783	User Name: ralphw

I believe that a simple Vs limit and a max hp value of perhaps 125hp instead of a max weight/cruise speed would allow use of numerous existing aircraft currently limited by the proposal (Ercoupes, C120/140, some Luscombes etc.). This would allow more development of new a/c as well as a greater utilization of the exisiting classic/antique fleet.

Comment NO: 793	User Name: airgus

I believe a weight and horsepower limit would be sufficient in limiting sport category aircraft. If I have to mount an inefficient propellor to keep a borderline aircraft within the speed limit, how will that make my plane safer? The speed limit will prohibit the development of more efficient general aircraft.

Comment NO: 802	User Name: adagio

If this "top speed in level flight" rule is adopted then please encourage governors on cars, trucks, etc. as the kinetic energy would be reduced there-by saving countless lives. Better yet, put a sliding tax on every thing that moves. The higher the kinetic energy the higher the tax. Money collected could be used to support a federal health insurance program and reduce insurance premiums.

Comment NO: 807	User Name: Riggs

The use of 2 seat, 1650 gross weight aircraft should be permitted. Specifically the Cessna 150, 152 and other makes in the same weight class.

Comment NO: 831	User Name: gkrug

While I basicly agree it would be nice to allow higher airspeed for pilots with specific training and experience. Composite aircraft has diffulty going slow even in level flight.

Comment NO: 850	User Name: johnckircher

Now the amount of "kinetic energy" is important because...Why? It makes me less dead if I crash? It determines how safe my plane is? If i have more weight i must fly slower to keep my "KE" down? Is that safe? Does the FAA regulate the laws of physics now? How about the amount of fuel I carry? That has energy, doesn't it? So is the FAA proposing radar cops in the sky to enforce speed limits and go with our drivers licenses? I would propose the FAA not concern itself about how fast i can fly. I may just invent a more powerful light engine and not want to apply for "permission" from the FAA because I can make my plane better than the regs permit. Last I looked, the more power a plane has, the broader its flight envelope, and the SAFER it becomes to operate! Is the FAA proposing to regulate this class of aircraft to a limited safty standard?

Comment NO: 881	User Name: whiteman

Some measure must be imposed, KE is as good as any. But, why not go all of the way and remove the speed limit, or limit it to Mach .95. Use KE exclusively, if you want to go faster lose weight. Let the designers deal with it....

Comment NO: 896	User Name: Spdrflyr

I don't have a problem with this one. You have to draw the line somewhere.

Comment NO: 919	User Name: Gator

VH is in fact a measure of speed/power ratio. The density altitude in the summer in Louisiana gets high. There is a need for more power. The problem is it affects the ratio. Placard the VNE and rely on honest pilots.

Comment NO: 936	User Name: Flyguy

I think this aspect of the proposed rule is unnecessary if stall speed and gross weight are specified. Do we really want to force owners to deliberately reduce engine power or in some other way reign in top speed at altitude to meet some capricious or arbitrary limit imposed by regulation? Seems to me that cross country recreational flying is being encouraged by this new certificate, and a speed limit on straight and level flight just works against economy, fuel efficiency, and enjoyment that you are trying to promote. Safety issues are much more critical on take off and landing, and gross weight and stall speed are easy to measure and enforce. I think you should drop the 115 knot limit altogether. I'd like to see variable pitch props permitted too.

Comment NO: 967	User Name: mwildman

The 115 know maximum cruise speed will be difficult to enforce. Instead, set an acceptable clean stall speed.

Comment NO: 978	User Name: dfreeman

I agree that there should be another method used and there should not be a restriction on the cruise speed. I would prefer a “rated horse power” limitation of say 120 H.P., if we don't think that max speed will be naturally limited by the stall speed restriction. As long as the aircraft can meet the proposed stall speed requirements (both landing configuration and clean stall) then why limit the cruise speed.

Comment NO: 989	User Name: Ro

No Comment

Comment NO: 1006	User Name: johnhenderson

I think the danger is when the airplane comes into contact with the ground and that does not happen normally in cruise flight. My first inclination was to permit any speed as long as the stall speeds were met, but I am concerned that as we push above 130 knots, we get into high performance aircraft that are more complex to fly. I would like to see the top speed addressed by an evaluation of the flying skills needed for the aircraft rather than an arbitrary speed limit.

Comment NO: 1037	User Name: RFI

I agree with the method used by the FAA to calculate top speed.

Comment NO: 1056	User Name: terryo

Sounds like a fine measure of the complexity of an aircraft.

Comment NO: 1076	User Name: gyrobee

No Comment

Comment NO: 1089	User Name: Gyroman

I agree it seem like a reasonable method to me

Comment NO: 1105	User Name: Flymo

I agree. The kinetic energy in level flight is measurable, and will likely retain a 'reasonable' relationship with the worst case KE in a dive from aircraft to aircraft.

Comment NO: 1112	User Name: fatplane

No comment

Comment NO: 1141	User Name: 21214

What is wrong with the current use of engine horsepower as a "cut-off" and then combining that with a maximum speed limit based on the aircraft type.

Comment NO: 1145	User Name: rotopup

Reasonable for some aircraft..not so reasonable for others. I could live with it.

Comment NO: 1185	User Name: heronium

No Comment

Comment NO: 1187	User Name: jonvee

A fair speed for the amount of training that is proposed.

Comment NO: 1204	User Name: Russ King

If they want to limit the speed than limit the actual speed, not the potential speed. An aircraft that can only do 115kts wide open at sea level may be underpowered at high density altitudes. Power is safety and does not have to be used purely for speed.

Comment NO: 1219	User Name: PWPlack

This proposal would appear to require pilots who wish to fly faster craft to move up to Recreational or Private certifications, which seems reasonable.

Comment NO: 1231	User Name: helitim

I think the 115 KTAS is very generous.

Comment NO: 1260	User Name: George

I have already addressed some of this in my comments to the first question. Clearly the kinetic energy associated with the landing or low speed end of operation is much more important for safty than that of the high end or cruise speed end of the speed spectrum. Like some of the ads indicate it is not how fast you are going that hurts, it is how fast you stop from a given speed. Thus keep the low end slow but perhaps open up the high end a little.

Comment NO: 1267	User Name: skiptyler

No Comment

Comment NO: 1287	User Name: jtriddle

The kinetic energy issue is an important one for safety, but ONLY IN AND AROUND AIRPORTS. This issue is addressed quite well by the Vs0, Vs1, & MTOW limitations. Many of the TO & landing accidents and fatalities ARE related somewhat to minimum controllable airspeed but also to weather conditions, total training, PIC experience, recency of experience, and experience in type, all of which are addressed in the NPRM The only part of the normal flight regime where Vh comes into play is during enroute or cruise operations. Most of the enroute or cruise accidents and fatalities are unrelated to Vh. Fuel mismanagement, flying into IMC, CFITs are much more at issue during enroute operations, and these are addressed quite well with the proposed requirements for training, logbook signoff, industry consensus standards for quality of design and manufacturing. Furthermore, the Vh limition is somewhat arbitrary, totally unnecessary and counterproductive to one of the driving forces behind aviation development...speed. By limiting Vh the incentive for designing more efficient aircraft is effectively defeated. This disincentive never was nor will it ever be a good thing for aviation.

Comment NO: 1291	User Name: dalswift

Increase gross weight and increase speed accordingly. Gross weight limitation is poorly thought out. Why insist that the 'plane be flimsy? If a 150 is too heavy. amy beginners wil be afraid of flimsier aircraft. If the aircraft meets the landing speed requirement, why does the FAA care if the plane is heavier (and more substantial)?

Comment NO: 1320	User Name: rhw5548

I believe it would be easier to limit the Max HP to say 100Hp or engine displacement. They do this with Race Cars and other motor craft to place them in catagories. It would be difficult to enforce top speed of an Aircraft. I beleive to Stall Factor is more important. The slower the stall the less someone will be seriously injured in an accident.

Comment NO: 1333	User Name: RTHOMPSON

No Comment

Comment NO: 1352	User Name: GeraldEmery

I think that the speed limitations are reasonable, but they should not be tied to weight limits.

Comment NO: 1367	User Name: sam

I think we all saw with the young man who crashed the C-172 into the building in Tampa what type of effect on property you can expect from an aircraft of that size and weight. I think that stall speed is the more appropriate consideration versus max continuous cruise. I believe that a good starting point for those numbers should be the figures from the existing two-seat certificated trainers, i.e. Cessna 150/152, Beech Skipper, Piper Tomahawk, etc... All of these aircraft have already been proven with time, they would provide a relatively stable transition fleet until new LSA aircraft begin to hit the market, and they would be more readily available to many prospective students and former aviators who do not have an ultralight nor a strong GA presence nearby. I'm from the Mississppi Delta and I don't know of any ultralight pilots/aircraft in my area and there aren't that many GA pilots/aircraft in my area, not to mention instructors. Give us as much leeway as possible with aircraft makes and models while maintaining the low-and-slow spirit of the proposal.

Comment NO: 1396	User Name: dschach

The speed limit is arbitrary. A airplane does not become unsafe at 116kts. While I agree that kinetic energy should be limited, this can be achieved by requiring a low stall speed without lift enhancing devices, keeping the aircraft gross weight low and limiting the available horsepower. My recommendation is to limit light sport airplanes to 100hp. Aircraft manufacturers should be encouraged to design the best airplane they can within these parameters. The speed limit encourages them to design less than ideal aircraft.

Comment NO: 1404	User Name: potentialpilot

Why not allow for an endorsement to operate an aircraft between 115 and 200 knots, OR allow fast flying only after X hours of flight time in an aircraft capable of at least 100 knots? The faster designs that otherwise comply would be flyable by sport pilots, but the pilots used to slower planes (or the low-time pilots) would need to spend a little time or get signed off before they were turned loose in the faster aircraft. It would also allow somewhat faster aircraft (Sonex, Zenith HDS) that otherwise comply with the NPRM to fly legally, so long as the pilot kept it slowed down until he/she got the proper endorsement or acquired a little bit of experience with similar types. That way even Ultralight pilots could gradually and legally step up to "fast" sport planes safely.

Comment NO: 1411	User Name: humair14

none

Comment NO: 1438	User Name: buster

I think the proposed Vh is reasonable;however, since Vh and Vo are so closely linked in any lightplane design, I think the stall speed requirement should be eliminated. This would simplify the rule and eliminate the need to differentiate betweeen flaped and unflaped aircraft. After all, flaped airplanes are freqently landed without flaps for gusty or crosswind landings.

Comment NO: 1469	User Name: Parris

You have to set a number somewhere, the 115 knots number is good for me.

Comment NO: 1474	User Name: sleepy

No Comment

Comment NO: 1507	User Name: RichJennings

With the creation of a new catagory of pilots who fly for pleasure in simple aircraft, comes the entirely logical need to create a class of aircraft suited to them. I agree with the FAA's desire to limit these aircraft to low "kinetic energy" designs. I'm not sure the proposed weights and stall speeds should be set in stone, as some flexiblity designed into the aircraftof-the-future might be nice to have. If the "standards" are instituted as-written, that leaves out quite a number of currently flying GA planes that would fit nicely into the "Sport Aircraft" intentions (example: Cessna 150/152, Piper Tomahawk, Beech Skipper, and other Classic aircraft that other respondants have mentioned). Leaving out the forementioned "trainer" aircraft, deprives the new Sport Pilot of ownership of a suitable factory-built aircraft already on the used market. Waiting for manufacturers to "develop" a group of new "Sport Aircraft" could take years, and thus it would get the Sport Pilot program off to a slower start.

Comment NO: 1508	User Name: divad

There is no magic here. Airplanes that weigh less than 1232 lbs and meet the clean and landing configuration speed requirements are already limited in maximum speed without pinning a number on it. This is accepted by the rest of the nations having Sport Pilot type regulation in the fact that they do not have a maximum speed or cruising speed limit. If this rule was written 10 years ago would you have made the speed limit 105 Knots or 20 years ago maybe 95 or 100 Knots. Give designers the freedom to design more efficient aircraft but tether them at the slow end to maintain safety. Think about your training. How much time was spent on triming for straight and level and how much on exploring the envelope on the low end where most accidents and incidents happen? I believe eliminating the speed limit will not adversly effect safety. Thank you.

Comment NO: 1513	User Name: v2twin

I believe the weight limit should be expanded, or perhaps waived, to accommodate certified two-place trainer aircraft in the Ercoupe/C120-140-150/Shinn/Varga type category. I would feel much safer in a proven design behind a reliable four stroke engine when compared to a flimsy machine powered by an unreliable two-stroke. After all, we have many years of proven safety records already available for these types of aircraft.

Comment NO: 1521	User Name: bjmoore

If limiting the kinetic energy of an aircraft is the purpose of the selection of 115 knots, the mass of the aircraft, which is directly proportional and inherent to the kinetic energy has been neglected. Kinetic energy is directly proportional to the mass of an object multiplied by the square of its velocity. Therefore, the limitation of the product of aircraft mass times Vh squared should be adopted instead of just on the basis of speed. Keeping units in SAE std, the maximum allowable kinetic energy should then be 1,232 lbs X (132 mph) 2 = 21,146,368 lb.- mile2/hr2. There have been several comments on Docket 11133 requesting increases in weight and speed to allow for light aircraft that do not make the criteria for sport aircraft. I have no objection to these requests. Should the FAA adjust the sp limitation to a more reasonable 1,500 lbs and 150 mph, then the maximum kinetic energy requirement should be stated similarly as 33,750,000 lb.- mile2/hr2. A table showing gross weights versus allowable maximum VH should be developed and included in the NPRM, with 5mph increments of speed showing the corresponding maximum gross weight allowance. 1232 lbs and 115 knots seems to be an arbitrary selection with no justification. A selection of 150 mph and 1500 knots would be more reasonable and also mnemonically manageable.

Comment NO: 1532	User Name: James Paul

I disagree, because there is no consistent way of evaluating this speed for non-certificated aircraft. Since the aircraft are fixed gear and fixed pitch prop with low stall speeds, what purpose is served in encouraging manufacterers to fudge on this number. Simplify! Just say that the aircraft has to meet the stall, seating and other criteria if it isn't certified.

Comment NO: 1542	User Name: Bill Bardin

This method seems fine to me, since I have no ideas of other methods which may be better.

Comment NO: 1552	User Name: llhoedl

I don't thing there should be a speed or weight limitation, as light weight experimental maintain speed over 200 mile per hour. As long as the flight is not for compensation or hire. And the pilot has the skill, he should be able to fly for personal use.

Comment NO: 1595	User Name: harveyking

Whats the point of kinetic energy? It makes little difference if you hit at 70 mph or 130mph, and when you fall in uncontrolled decent, you will probably hit at least at 180mph. The real issue should be how much skill is nessessary to pilot this catagory safely. VH alone will not define a level of nessessary skill. Almost any low hour pilot could safely fly a 108 Stinson. But a 115 knt. "Jennies Tennie" could be a real hand full.

Comment NO: 1603	User Name: davidbauch

No Comment

Comment NO: 1626	User Name: awilliams

The stall speed, seating and weight limit should control the top speed of "light-sport aircraft". I don't like the 115 kt. speed limit because it affects the efficiency of an aircraft. Considering the training level of the sport pilots I understand the concern for the limit. However, if KE is to be the limiting factor for speed, why not allow lighert aircraft higher speed limits at the same KE. For example a plane of 964 lbs. would be allowed a top speed of 130 Kts. and have the same KE as the proposed rule.

Comment NO: 1632	User Name: JSTO1

There should not be an upper speed limit as part of the definition. The sole criteria should be stall and landing speeds. The efficiency of the aircraft should not be limited by this arbitrary criteria. There is little danger that designers will incorporate insufficient strenght for cruise and landing conditions. On the other side, low power to keep the speed down will turn deadly at pressure altitudes on a regular basis.

Comment NO: 1635	User Name: live2av8

YES, I believe measuring Vh speeds is an adequate method. However I don't agree with the 115 knots, it's too slow for many FAA pilots that have lost their medical for various reasons and will be flying under Sport Pilot, yet too fast for what I classify as single and 2-place ultralights but that's answering another question. -live2av8-

Comment NO: 1660	User Name: TOMS

There should be no uper limit cruse.With the weight limitation you can only pack so much HP and airplane togeather and will self limit the speed if it is designed correctly.

Comment NO: 1666	User Name: falcon

Under the NPRM the velocity and wt results is a maximum value for KE. Does this mean that the values for velocity and weight can vary as long as the KE value does not exceed the maximum value?

Comment NO: 1676	User Name: bliddel

The concept of kinetic energy or potential energy transfer is a valid one for limiting sport pilot operations, as whatever line is drawn will limit the damage that can be done to persons or property on the ground. How this limit is implemented is quite another matter. The kinetic energy of an object in motion (from classical mechanics) is the product of one half the mass times the square of the velocity. This is the number that should be limited. If you believe there is some magical significance to 600 kilograms and 115 knots, then the energy for that combination is 3,967,500 Kg-Knots-Squared. This damage potential is exactly the same as an object weighing 2204.167 Kg moving at 60 knots (and simultaneously exactly the same as a 231.84 Kg object moving at 185 knots). The velocity is only important as a limiting factor when taken in conjunction with the mass. Velocity as a limiting factor in itself would be a counterproductive and unsafe limitation. Why? Aerodynamic laws, simple economics, and marketing will continue to dictate design. Suppose as you propose, a manufacturer must limit maximum cruise and has no restriction regarding the manner in which the aircraft complies with that limit. As a direct result, you risk having aircraft with inadequate horsepower for high density altitude operations or you have aircraft with inefficient propellers or aircraft equipped with drogue chutes or whatever. All of these methods of compliance would pose adverse risk factors and none of them would do anything to improve safety where it is most critical. Where safety and controllability count are in takeoffs and landings, precisely where maximum cruise is totally irrelevant. Furthermore, any pilot will tell you that wind dramatically affects groundspeed, and groundspeed is the version of speed which determines energy transfer potential at any given instant. I propose instead that you alternatively limit the total kinetic energy to an equivalent arbitrary value, but enforce this by requiring a slow stall speed, and perhaps also by limiting horsepower per kilogram of actual takeoff weight, but let mother nature take care of the rest. This would also serve to foster innovation and competition among designers and manufacturers, which would benefit the safety of the entire aviation community, just as it should. One of the most absurd restrictions on small aircraft is on maximum gross takeoff weight. It is absurd because manufacturers compete in the marketplace on performance, and so they intentionally limit certificated weights in order to publish better performance numbers. This unfairly penalizes those who cannot practically stay within those weights (the average US adult is now considerably more than 170 pounds), while offering no compensatory advantage to flying half empty. For example, an 800 pound composite aircraft with a 500 pound (crew and fuel) payload is likely well over the maximum gross weight, but may still perform acceptably, though not as well as published. A nearly empty Cessna 150 with a single 140 pound pilot and half fuel would weigh significantly less than the 800 pound composite (as loaded in the previous example). The Cessna would still be illegal under this proposal because the maximum takeoff weight is above the arbitrary limit, in spite of the fact that it has obviously proven to be very safe over the last 45 years! Any FAA-enforced maximum weight limit should again be a simple arithmetic function of competing parameters. An example of such might be to allow an arbitrary actual gross takeoff weight adjusted for density altitude. Another example

might be to limit actual takeoff weight to whatever quantity that predicts at least a 200 fpm rate of climb immediately out of ground effect at the point of departure under prevailing weather conditions. Given today's very inexpensive calculators, this is easy to measure.

Comment NO: 1682	**User Name: john brady**

I agree that this should be a good proposal that all parties have worked out at this time-EAA, FAA, etc. I know we can not satisfy everyone but I think we need to do whatever it takes to compromise so this NPRM can go forward to a final rule as long as we do not compromise safety. We need to keep safety, training to the highest standard and let's move aviation forward.

Comment NO: 1708	**User Name: Gene Cook**

I am building a Sonerai II that has a maximum gross weight of 925 pounds. This weight is well within the proposed limit for maximum sport aircraft gross weight however the maximum cruise and stall speed are both slightly above the limits proposed Under the currently wording I would not be allowed to operate this aircraft under Sport Aviation rules even though the kinetic energy generated by this aircraft is less than would be generated by an aircraft at the maximum allowable gross weight since kinetic energy is a function of mass and velocity squared. I think that a far better wording of the rule would limit the maximum weight, maximum cruise speed, and maximum stall speed as proposed however would also allow an aircraft to be operated under Sport Aviation rules if the KINETIC ENERGY generated by the aircraft is less than the kinetic energy generated by an aircraft operating at the maximum allowable Sport Aircraft gross weight and maximum cruise/stall speed.

Comment NO: 1727	**User Name: mav**

Why is the sport of flying considered by the government so inherently different from other pursuits by the public? The kinetic energy of a Cadillac sedan driven unsafely by an octegenarian in Florida could reduce a small village to kindling. Sport water craft can be fitted with huge engines turning bass fishermen into Indy drivers. A 1200 pound LSA flying safely at 250 mph would do no damage while one limited to 115 being flown by a fool intent on destruction could kill many. The government cannot legislate against fools or criminals to thwart their behavior. I suggest limiting the speed of LSA in control zones such as landing patterns but the potential speed should not be factored in.

Comment NO: 1730	**User Name: BradKramer**

I would prefer to see a standard for wing-loading, along with increased figures for gross weight and speed. The wing loading inherently says a lot about the handling qualities and speed ranges of a plane. It would offer some flexibility to, say, have certain airplanes that could only be flown solo (maybe a Cherokee 140 for example). Or, in my case, a Hatz Biplane that's as easy to fly as a Cub or Champ and has a very light wing-loading, but happens to have a gross of 1,500#. Any airplane with light wing-loading is likely going to have limited kinetic energy with which to do damage to others. And they generally have gentle & similar handling qualities.

Comment NO: 1732	**User Name: BradKramer**

After reading other comments, I'd have to agree with many that there should be allowable trade-off's between top speed and weight (i.e. the actual kinetic energy, rather than single figures for speed and weight). Stall speed and K.E. should be the limitations. Also pilots should be allowed to operate aircraft that don't qualify, as long as they fly in a configuration that's within the limits and the intent of the rules. For instance, a Piper J5 as long as there are only one or two people aboard. (it's considered a 3 seat)

Comment NO: 1756	**User Name: BigSkyAviation**

For the new category of factory-built planes this is fine. However, many planes being proposed will actually go much faster. This will be ignored and side-stepped by the factories selling planes with the prop pitch set for low top speed.

Comment NO: 1768	User Name: edburkhead

I think 115 knots is a reasonable rule. I think the stall speed restriction is overly limiting. There are a lot of planes such as my Ercoupe which would be quite safe for a Sport Pilot to fly which are at or just over the minimum-flying-speed / stall speed rule and at or not too far over the gross weight rule. Many of these planes would be SAFER than average for Light-Sport Airplanes. I'd like to request one or more of these possibilities:1. Any certificated aircraft which meets the Light-Sport Aircraft requirements at the moment of takeoff and throughout the flight may be flown by a Sport Pilot under the Sport Pilot / Light-Sport Aircraft rules. Just as a Private Pilot is eligible to fly a Light-Sport Aircraft under Light-Sport Aircraft rules, a certificated aircraft may be flown by a Sport Pilot provided it meets the Light-Sport Aircraft rules DURING the flight. If flown by a Sport Pilot, the pilot must satisfy the same make and model training requirements as for any other Light-Sport Aircraft. The aircraft's eligibility may be established by an AI and recorded in the aircraft's logbook. Aircraft performance must be within the Light-Sport Aircraft category. The aircraft's gross weight must satisfy the Light-Sport Aircraft rules only during flights in which a Sport Pilot is pilot in command – this may require that the flight be conducted at less than the aircraft's certificated gross weight. 2. An aircraft may be flown as a Light-Sport Aircraft if it's gross weight is less than 750 Kg (1653.5 lb.) at takeoff. Justification: It's silly to exclude a Cessna 152 while allowing much more dangerous planes to be flown as Light-Sport Aircraft.If the aircraft can't be flown to a foreign country as a Light-Sport Aircraft at this gross weight, then it can't. Our nation is large and populous enough to adjust our Light-Sport Aircraft rules to our predominance of wide-open spaces and long distances. 3. A certificated aircraft which does not exceed the maximum level-flight airspeeds of the Light-Sport Aircraft rules may fly as a Light-Sport Aircraft even if it's minimum flying speed or stall speed is higher than is required for pure Light-Sport Aircraft. This will be allowed because the certificated aircraft has undergone much more rigorous development, testing and certification than Light-Sport Aircraft.

Comment NO: 1790	User Name: steve.stefanic

Limiting kinetic energy in cruise is not as important as limiting kinetic energy in landing (especially emergency, engine-out). The greatest safety advantage comes from maximum stall speed and maximum weight which I believe are ok in the proposed rules. Even in the low speed landing range, I would allow aircraft manufactures the flexibility that if they lower the stall speed, the weight could be increased a little to achieve the desired kinetic energy. Once the aircraft in in cruise, a collision with another object at 115 knots is not much different than a collision at 130 knots; even though the kinetic energies are quite different, the end result on the occupants is about the same, just as it is for any automobile doing 80 on the highway. Permit a little higher cruise so everyone isn't forever limiting speed with prop pitch. In fact, take the cruise up enough so that a few more of the light GA aircraft qualify for Sport Pilot as long as the landing Kinetic Energy requirement can be met.

Comment NO: 1802	User Name: gldrboy

I think this makes the rule too complicated. Stick to stall speed and gross weight, but raise the proposed limits. To not include a C152 or ercoupe is just nuts--these aircraft are as safe and easy to fly as they get!

Comment NO: 1809	User Name: rjdaugh

I feel the gross take off weight should be increased slightly to take in many more good, safe, easy to fly airplanes like the C-150 or Ercoup - and many others that are good light planes. The concept of limiting kinetic energy is a good one, but the figure chosen necessarily must be chosen arbitrarily. I feel it could and should be higher. The Stall speed - more related to kinetic energy when landing - is more relevant to safety.

Comment NO: 1810	User Name: snyd1437

I wholeheartedly agree with the spirit of this regulation. Sport pilots will not have the same training as certified pilots and therefore should not fly complicated, powerful, and potentially dangerous airplanes. I hold a private pilot's certificate and have logged around 150 hours. For the last two

years I have been grounded mostly because flying certified aircraft (while extrememly safe) is quite expensive. My hope is the light-sport aircraft would provide a lower-cost alternative while maintaining a high-degree of safety for the participants and by-standers. In the interest of safety I would like to see the gross weight restriction raised to the EAA recomendation of 1300# to allow designs to include heavier certified engines from Lycoming and Contentinal. I don't think I would be very excited about flying behind a two-stroke turning over 5000RPM, requiring belts or transmissions, increasing complexity while decreasing safety and enjoyment. I'd at least like the option to choose. I've seen a lot of people talk about raising the gross to 1500 or more lbs to include Cessna 150's or other current designs. While there is merit to the comments and as much as I'd like to fly a 150 more affordably, I would rather see people become certified pilots to fly a 150. While a 150 is not as complicated as a Mooney, it is more than a Kitfox. Allowing sport-mechanics to perform any repair on a 150 (including rebuilding the engine) with only 80 hours of training seems unrealistic. Because the 150 has such a limited payload, it is probably flown "over-gross" more than any other plane so raising the weight limit to include a plane that barely squeaks by in a category that is was not designed for would seem to open the door to abuse of the rules with resulting increase in accidents.

Comment NO: 1827	**User Name: megamouse**

Maximum kinetic energy within the ranges we are talking about should be a concern in fligh safety. Of much more concern are the speeds at which approaches and take offs are performed. I think that wing loading and flaps up stall speed, & max horsepower are better criteria. This will result in Sport aircraft that will fly faster than many low end certified aircraft, but that is what it should be, low landing speed, lightweight, and highly efficient aircraft.

Comment NO: 1833	**User Name: kpcp**

VH is an engineering-scientific and historically proven means of measuring and limiting the KE of an aircraft. Several different kinds of Light-Sport aircraft designs are addressed in this NPRM: Several different engineering-scientfic may be more appropriate to a specific kind of aircraft -- e.g., Powered Parachute Aircraft designs should be limited by pendulum swings (as a function of power surges).

Question Number 8 - The FAA excluded gyroplanes from being eligible for a "special, light-sport category aircraft airworthiness certificate" because of the complexity inherent in the design of rotary-winged aircraft. In addition, experimental gyroplanes lack standardized, recognized design, performance and handling criteria. Do you believe the FAA should reconsider including gyroplanes for that certificate? If so, please include any data to support your reasons.

(8) The FAA excluded gyroplanes from being eligible for a "special, light-sport category aircraft airworthiness certificate" because of the complexity inherent in the design of rotary-winged aircraft. In addition, experimental gyroplanes lack standardized, recognized design, performance and handling criteria. Do you believe the FAA should reconsider including gyroplanes for that certificate? If so, please include any data to support your reasons.

Visited: 195	Total Comments: 100	Last Post: 5/6/02

Comment NO: 31 **User Name:** delta2ul

rotary wing should be excluded.

Comment NO: 69 **User Name:** flyfree

I agree.

Comment NO: 84 **User Name:** Bradley

No Comment

Comment NO: 100 **User Name:** artspain

No Comment

Comment NO: 142 **User Name:** daberti

No experience to make the call

Comment NO: 159 **User Name:** barnesrc

I agree with the proposed rule. Gyroplanes are a totally different animal and should be treated with other rotary wing aircraft.

Comment NO: 175 **User Name:** Ultraliteteacher

Gyroplanes have long been within the Part 103 rules. Gyroplanes must be re-included to this exemption replacement. Without such, there will not be significant less ability to train the gyro pilot. This has no merit in safety. Instruct to live, live to instruct. The lack of standards may have been produced by the obsticles in the way of training. If you learn in a Piper, you will want to fly them as you progress to your own aircraft. The same should apply to Gyro's. Manufacturer loyalty is strong within aviation. This is due to pilot's desire to fly known dangers, and not tempt fate when avoidable.

Comment NO: 199 **User Name:** sthomason

Not enough experience to give a valuable opinion.

Comment NO: 215 **User Name:** Batson

I am not experienced in this area and can't not present an informed opinion.

Comment NO: 233 **User Name:** nleggett

I think that gyroplanes should be included in light sport aviation. Reasonable standards can be developed for the design of these aircraft. Nickolaus E. Leggett, Private Pilot

Comment NO: 255 **User Name:** capella1

We see no reason why a Sport Pilot Type Rating for both Gyroplane and Helicopter should not be included. Certification of these craft is a seperate issue that could be dealt with in the "Consensus Standards".

Comment NO: 301	**User Name: deeph2o**

No Comment

Comment NO: 357	User Name: jwalters

KEEP THE EGG BEATERS OF DEATH OUT OF IT.

Comment NO: 394	User Name: bobkat

A friend has an ultralight gyroplane that seems very safe, etc. I don't think that if it were a bit heavier it would be "unsafe" Put it back in.

Comment NO: 405	User Name: wjwil

No Comment

Comment NO: 440	User Name: slacker258

I agree with the FAA position of excluding it from being considered special L/S category. A gyroplane/helicopter by design is a complex aircraft to fly/maintain.

Comment NO: 479	User Name: Steve

No Comment

Comment NO: 499	User Name: William G. macIntyre

No knowlege of gyroplanes.

Comment NO: 501	User Name: W6KOW

The FAA should include gyroplanes in the rule. These machines are simpler to build and operate than airplanes, but dual instruction is critical to saving lives. The only current viable gyro flight instruction is via an exemption. Sport pilot/LSA offers a way out of this problem by licensing both the aircraft and gyro instructors.

Comment NO: 519	User Name: Taylorcraft078

Include gyros but not helicopters.

Comment NO: 545	User Name: 584241

No Comment

Comment NO: 570	User Name: stewart

Gyroplanes should absolutely be included in the certificate. They have been in the part 103 regs for years now. By the way, what exactly are the standardized, recognized design, performance and handling criteria for ultralights?

Comment NO: 593	User Name: goluscombe

If I understand this question correctly, it seems a bit contradictory on the face of it to say that exprimental gyroplanes lack in certain criteria when fixed-wing experimental aircraft have similar issues. If the FAA views the producers of gyrocraft of not being able to produce gyrocraft to a particular set of criteria, could we not create a reasonable set of criteria and challenge the industry to meet them?

Comment NO: 615	User Name: cec1155

They are intersesting to watch fly, a little scary. I prefer wings and glide path.

Comment NO: 625	User Name: greywing

Gyroplanes should be included, but not helicopters. Gyroplanes are NOT complex in design as opposed to helicopters. The gyroplane is in a state of auto-rotation before achieving flight and can set down on a dime. Loss of engine power in a gyroplane is not near as dangerous as in most fixed wings in that a gyroplane can land with little or no forward roll, which offers many more potential landing sites than fixed wing. Most non-certified aircraft today lack standardized design, performance and handling criteria.

Comment NO: 658	User Name: glaunt

Why not include them..the ultralights (in this Country) do not yet have standardized design, performance and handling criteria yet...I say get a consensus for the gyro design too....just like we'll need for the powered parachutes and trikes.

Comment NO: 659	User Name: glaunt

Why not include them..the ultralights (in this Country) do not yet have standardized design, performance and handling criteria yet...I say get a consensus for the gyro design too....just like we'll need for the powered parachutes and trikes. The rotor's are not driven..much simpler than a heliocopter.

Comment NO: 703	User Name: mccoy3

No Comment

Comment NO: 712	User Name: Steve

Agree

Comment NO: 736	User Name: Wayne McIntosh

I do not know very much about gyroplanes but people seem to be flying them safely. There are certified gyroplanes in general aviation so there must be some design and performance criteria available or the FAA would not have certified them. There are certain flight conditions that are dangerous in gyroplanes and there are certain flight conditions that are dangerous in weight shift, 3 axis, powered parachutes etc. I would think that gyroplanes could be included in Sport Pilot if some research was done on them.

Comment NO: 740	User Name: towpilot

Gyroplanes bring a whole raft of additional maintenance considerations in addition to being difficult to operate. They should be excuded from the rule.

Comment NO: 775	User Name: Rich Wallin

Gyroplanes are too complex for this catagory.

Comment NO: 795	User Name: airgus

No Comment

Comment NO: 832	User Name: gkrug

Agree, without comment.

Comment NO: 852	User Name: David Hodgson

Small giroplanes are not as difficult as helicopters I would recommend a type endorsement.

Comment NO: 863	User Name: johnckircher

I agree with the exclusion, and disagree with add ing gyroplanes to the new regs.

Comment NO: 882	User Name: whiteman

I do not favor including rotary-winged aircraft in this NPRM. I feel that these aircraft should have their own regs based on existing FARs that govern the type.

Comment NO: 887	User Name: frjn33

I agree that the FAA should reconsider this arbitrary exclusion. You are thinking again with a GA mentality. Why should not someone who has been flying a gyro under FAR 103 be able to be included in Sport Pilot? Do you have statistics which indicate there has been a higher accident rate with gyros than other ultralights? You are so hung up on "certificated" aircraft that you can't see beyond the concept.

Comment NO: 903	User Name: tbrandt

Yes the FAA should reconsider including gyroplanes in certificate. Within the definition of LSA, eligible gyroplanes are limited to certain parameters like the other aircraft. This reduces the some of the "complexity inherent in the design of rotary-winged aircraft". There is a body of recognized design, performance, and handling criteria from which current gyroplane builders draw. The FAA has drawn on some of this information to provide some operational and performance information in the Rotorcraft Flying Handbook, a useful pilot training and reference tool. If each gyroplane were absolutely unique we would not have the ability to summarize such information in the ndbook. I believe that the discussions and actions necessary to get to a consensus standard and then allow for the issuance of a special LSA airworthiness certificate for gyroplanes would benefit the gyroplane community and the gyroplane pilot as these come to market. It further allows movement toward an example aircraft that can help fill a training void and that would contribute to safety.

Comment NO: 961	User Name: dfreeman

I believe that gyroplanes should be included in the light sport certificate program. If “consensus standards” are going to apply to all the other classes of aircraft, why wouldn't it apply to gyroplanes. If a gyroplane kit manufacturer could meet these “consensus standards” then why not allow them to participate. After all, they definitely meet the other requirements of stall speed and weight (perhaps better than other classes of aircraft), and could just as easily be built from a kit that meets the requirements of the Experimental Light Sport Aircraft.

Comment NO: 962	User Name: Spdrflyr

This seems ok. I don't have a problem one way or the other...

Comment NO: 1007	User Name: johnhenderson

I am confused, I thought helicopters were excluded, but gyroplanes were included in the proposal.

Comment NO: 1011	User Name: Dave Jackson

It is understood that you are excluding rotorcraft from Sport Pilot/Plane. But, you may wish to consider the proposed European JAR-VLR [http://www.rai-enac.it/volabilita/precedenti/35-36/art10.htm] in respect to future inclusion of rotorcraft.

Comment NO: 1032	User Name: carltoni

If the gyroplane is excluded from the Special certification, there will have to be a provision made to continue training for hire. If craft currently being used for training go ahead and register as Experimental Light Sport during the 24 mos. grandfathering time, they should be able to continue as trainers with a letter of deviation authority or continued exemption beyond the 36mos. If not, how in the world would a student get any legal training? As far as the complexity of the gyro, it really is pretty simple. There are many different design theories, but I think a consensus standard could be created. I'm not sure 3yrs would be enough for craft to actually be available for purchase. Most gyro manufacturers are very small enterprises.

Comment NO: 1038	User Name: RFI

The FAA it totally out in left field with their opinion and ideas about gyroplanes being complex and that there is no standardized design. That is absolutely hogwash and the FAA (as a whole) is totally ignorant of the design and workings of gyroplanes. If one considers certified gyros which have fully articulated rotors and collective systems then there is some validity to the argument, but all sport gyroplanes are spinoffs of the Bensen Gyrocopter which utilizes a gimballed, underslung, teetering rotor system with fixed pitch. That system is as simple as dirt and anyone with any engineering background can see that. The airframes are bolt-together aluminum tubing and cluster plates. What could be simpler? Almost all of the gyros on the market are copies of the Bensen except for those manufactured by Air Command and Barnett Rotorcraft which utilize triangulated round aluminum tubing in the case of Air Command and welded steel tube in the

case of Barnett. Air Command gyros are built from well proven ultralight materials and structural designs and the Barnett ships are built to Part 23 standards. There has never been a known failure of a Bensen style rotor system except for those that were fabricated with "stove bolts", etc. that did not meet aircraft standards. The problam with gyroplanes is the lack of training. They are probably the simplest and safest of any type of flying machine but training was almost nonexistant until a few years ago when two place machines were made available. If the gyroplane is excluded from the Special Light Sport category then it will set back the movement and cause even more accidents due to the lack of availability of training. Gyroplane enthusiasts are a minority but that is no reason for the FAA to exclude them from the Light Sport Aircraft umbrella.

Comment NO: 1057	**User Name: terryo**

The common two-blade teetering rotor gyroplane is about as basic a flying machine as is currently in use, (a hot air baloon is about the only air vehicle simpler). The only thing confusing about gyroplanes is adjusting our concept of how an air-foil acts and the control of a rotor, NOT an obscure or difficult subject.

Comment NO: 1063	**User Name: Mike Boyette**

Gyroplanes should be included. A gyro is just a easy to operate as an ultralight. Obviously if included the FAA needs to get with Manufactures with proven safe designs and adopt some standards of safety. These should include thrustline to C.G. relationship and the use of horizontal Stabilizers.Also the FAA needs to let the current CFI's be grandfathered in after 3 years.

Comment NO: 1066	**User Name: chuter**

Yes, I agree the FAA should reconsider. Gyroplanes are not complex to anyone who is willing to spend an hour reading about them. Helicopters are complex, gyros are NOT. The teetering rotor system is as simple as you can get. As long as you understand a few basic design principles like thrustline-to-CG relationship and horizontal stabilizers, there's no problem. This has all been ironed out in the last 10-15 years by anyone who has been paying attention. In many respects they are safer than fixed wing aircraft: they can't stall, and they can land in an extremely small space. There's no reason not to include them. PLEASE make some provisions for training after the current exemption expires.

Comment NO: 1070	**User Name: thumper**

Yes, Gyroplanes should be included. I have been building and flying Experimental aircraft since 1972. I have built fixed wings and Gyroplanes. Gyroplanes are far more LESS complicated than a fixed wing. There are actually less moving parts. Most Gyroplanes are 'open' to the extent that they can be completly inspected prior to EVERY flight. Airplanes typically hide some of the more critical parts, ie, flight control rigging and engine components. Gyroplanes have received a bad reputation in the past, due to the lack of training and education available during those times. Most airplane 'drivers' were taught, by people knowing ZERO about gyros, that gyros are death traps. With my experience as an Airplane CFI, an A&P Mechanic, and a Commercially rated Gyroplane pilot, that Gyros are far easier to maintain and fly than fixed wing aircraft. They are safer than a fixed wing during an engine out situation because of the small area required to set it down. Excluding Gyroplanes from Sport Pilot will set the Gyroplane category back 15 years. We need to make it easier for a person to become a Gyroplane Instructor and also easier to maintain an appropriate two place aircraft for training. Excluding Gyroplanes will move us back to the days where there are 'renegade' students trying to teach themselves to fly. To me, excluding Gyroplanes from Sport Pilot would be very close to a criminal offense.

Comment NO: 1081	**User Name: gyrobee**

I think the "complexity" issue is widely misunderstood with respect to gyroplanes. Helicopters are complex aircraft and should be excluded, just as complex fixed-wing aircraft have been. However, just because gyroplanes are rotorcraft, this does not mean that they are complex and they are no more worthy of exclusion than simpler fixed-wing designs. In terms of structure and systems, the typical sport gyroplane is simpler than many or even most of the fixed-wing aircraft that are being included. Considerable progress has been made in the last decade with respect to gyroplane design criteria and the dynamics of gyroplane flight stability. Section "T" of the British CAA

regulations is one example, if overly complex, of how this understanding has been applied in a regulatory context. The PRA and the gyroplane industry are in the process of developing consensus standards that should make gyroplanes as amenable to certification as any other aircraft currently under consideration.

Comment NO: 1092	**User Name: Gyroman**

I can see no logical reason to exclude gyrocopters --there is almost no aircraft simpler than a "basic" gyrocopter-- I have built three of literally from scratch -- it well within the skills of the average experimental homebuilder. I have also constructed two fixed wing aircraft -- therey are much more complex in their construction ---ALLOW the GYROS in!!

Comment NO: 1098	**User Name: Flymo**

The complexity of a helicopter is undeniable. Autorotation is but one of its many potential modes of operation, but this is the sole mode of a gyro rotor, and the required mathematics are accessible to smart school-leavers, let alone professional engineers. Structural engineering requirements are the same regardless of type, and stability simply needs to be positive. With the strides made in recent decades in quantifying gyro stability and performance I see no insuperable obstacle to inclusion.

Comment NO: 1099	**User Name: Walker**

Gyroplanes are not a "complex" aircraft. Gyroplanes are about as safe an aircraft as can be made, given that the pilot has received proper training. Excluding gyroplanes from the rule will make receiving the proper training more difficult, since there will be fewer instructors available, and the few that are availble will be very expensive to hire. The "historical" view that gyroplanes are dangerous comes from a period in the relatively recent past where people without self discipline were trying to self train. Many of them were conviced that because they could fly a fixed wing, they could fly a gyro. This self training / attitude led to many deaths. If the number of Instructors decreases, I forsee a reversal of the current trend (which is to seek out a qualified instructor), and an increase is self training. If this happens we will see an increase in the number or deaths. Do not arrogant and assume that this is strictly a gyroplane problem. Make it equally difficult to become a fixed wing CFI and thus reduce the number of fixed wing instructors and the number of fixed wing deaths would increase due to self training too.

Comment NO: 1113	**User Name: fatplane**

No comment

Comment NO: 1129	**User Name: Topspin**

Data? How about just thinking logically? At the moment there are only two certificated gyroplanes available to get checked out in to get a private gyroplane certificate. And I challenge you to find either one of the two that is readily available to the general public! In other words it has become increasingly difficult to get a private gyroplane certificate. This has been the biggest impediment to gyroplane growth. There are other commercially available gyroplanes that could/will meet the light sport aircraft air worthiness standards. They just happen to be in the experimental category at the moment just like a large majority of the experimental fixed wing machines. Including the gyroplane with the accompanying standardized, recognized design, performance and handling criteria would legitimize the gyroplane and give it the respect it richly deserves. To say that "standardized, recognized design, performance and handling criteria" isn't available isn't true. A true statement would be, this criteria hasn't been compiled into a document for presentation to the FAA. The FAA Rotorcraft Directorate knows full well that the Popular Rotorcraft Association has/is working on such a document and it has still chosen to exclude the gyroplane. This makes absolutely no sense. This is a simple aircraft and the document would be ready by the time the light sport aircraft rule goes into effect. There must be other reasons for excluding the gyroplane that we haven't been told about. What are they because the ones given shouldn't keep the gyroplane from being included.

Comment NO: 1143	User Name: kingss

I can see no reason to exclude gyroplanes from the nprm. I read the comments by people who thought they should be excluded, not one gave any reason, other than complexity, for favoring the exclusion. Anyone who is familiar with gyros know that they are in fact less complex that a fixed wing aircraft.

Comment NO: 1144	User Name: 21214

If you look carefully, there are really only a few designs of most gyroplanes. Tractor, The standard Bensen design, and the newer centerline thrust pusher designs (like the Dominator or the new Air Command) The FAA should include gyroplanes in the light-sport aircraft catagory when they can be shown to comply with simple to understand design concepts (Like centerline thrust, the inclusion of a horizontal stabilizer etc)

Comment NO: 1149	User Name: rotopup

There is no logical reason to exclude a gyroplane. I have ratings in fixed-wing and Gyroplanes and have built both types. Simple gyroplanes are not as complex as most "simple" airplanes.

Comment NO: 1186	User Name: heronium

No Comment

Comment NO: 1192	User Name: jonvee

Gyroplane are very simple aircraft. They do have different criteria for design. The information is easily available. They do need to meet a consensus standard.

Comment NO: 1195	User Name: Russ King

Gyroplanes should be included. They have few moving parts and those parts are easily visible for inspection. Modern designs that incorporate centerline thrust and horizontal stabilizers can be flown quite safely with proper instruction. Gyroplanes were origionally invented and flown as a safer alternative to fixed wing aircraft because they cannot stall.

Comment NO: 1209	User Name: narrowacre

AGREE! Do you believe the FAA should reconsider including gyroplanes for that certificate? YES ! RECONSIDER INCLUDING GYROPLANES. (The results of AGREE-DISAGREE will be abiguous because it is not clear whether I am agreeing with the FAA excluding gyros or the question of reconsidering inclusion). EXCLUDED GYROPLANES "...because of the complexity inherent in the design of rotary-winged aircraft." YOU MUST BE KIDDING! Consider the complexity of experimental jet, turbine, floatplanes, rogallo gliders, multiengine, amphibians, powered paraplanes, and flying-wing aircraft. Certainly some of these should be excluded from being eligible also. The FAA should INCLUDE gyroplanes in the light-sport aircraft category when they can be shown to comply with simple to understand design concepts (Like centerline thrust, the inclusion of a horizontal stabilizer etc). These standardized, recognized design, performance and handling criteria are available. I have built and currently fly an experimental gyroplane.

Comment NO: 1223	User Name: PWPlack

I am a fixed-wing student, but have studied rotorcraft as well. Helicopters may be too complex for this NPRM. The two-bladed teetering gyroplane, however, is among the simplest and safest of all aircraft designs, provided pilots receive basic training. In general, inspection and maintenance of control systems and powerplants will be easier than for so-called "simple" fixed-wing planes. I believe gyros should be included. Current kit manufacturers have a strong financial incentive to arrive at consensus standards. Once this happens, all manufacturers will have the option to participate.

Comment NO: 1233	User Name: helitim

Gyroplanes should be excluded along with the instructor aircraft.

Comment NO: 1279	User Name: t2rogered

The FAA should reconsider. Gyros are not any more complex than most other light aircraft. However, training is at least as necessary, if not more so, due to the unique characterists of the machine. The handling features between gyros is not anymore diverse than those of tail draggers vrs. trikes etc.

Comment NO: 1285	User Name: craigj00

I believe that gyroplanes should be included in the light sport certificate program.

Comment NO: 1293	User Name: Goflyslow2

Gyro planes shold not be considered elegible. The question is moot however, as Sport Pilot and Aircraft should not become a new certification/catagory.

Comment NO: 1305	User Name: gyronutman

No Comment

Comment NO: 1307	User Name: gyronutman

I disagree. I do believe the FAA should reconsider including gyroplanes for that certifcate! SAFETY is the reason.If there are not certifed gyroplanes for instructors to train in where can one learn to fly gyroplanes safely and legally?

Comment NO: 1308	User Name: gyronutman

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Comment NO: 1315	User Name: lrbutler

I disagree that gyroplanes are inherently more complex. The early Pitcarin designs indicate that the designs can be simple and aerodynamically stable. By requiring that gyroplanes meet consenus standards, will help to marginalize the unstable, "bleeding edge" experimental designs and provide the flying community with a safer craft.

Comment NO: 1317	User Name: lsippell

They should be included.

Comment NO: 1326	User Name: MikeCleaver

I disagree with excluding gyroplanes from the FAA proposal. Gyroplanes are much simpler than helicopters and require category and perhaps class endorsements, but the British have an acceptable standard in BCAR Section T (modififed by the Australian Sport Rotorcraft Association to make it more practical to apply). Both in the UK and in Australia there are adequate pilot training programs that equip a pilot to fly independent of an instructor after passing a flight and knowledge test that takes about 20 - 25 hours of flight training. To exclude these pilots from recognised two-place training in machines which meet a concensus or simplified external certification standard will deprive them of the safety measures which are well argued in support of similar standards for aeroplanes. The dangers of unloaded rotors must be taught and discipline instilled, as most accidents arise from low-time pilots loss of control by pushing the stick forward too quickly, or trying to fly too fast, or by rotors becoming unloaded by mechaincal failure of things like trim springs. Mike Cleaver Sport Aviation Inspector Civil Aviation Safety Authority Australia

Comment NO: 1359	User Name: knight starr

I am sorry but I have not trained in gyroplanes, but have looked into them in literature. In general, though, I do believe that there are several fairly safe models out there and that they do offer some exceptional safety benefits such as safer emergency landings, so I do believe they should be included.

Comment NO: 1360	User Name: knight starr

I am sorry but I have not trained in gyroplanes, but have looked into them in literature. In general, though, I do believe that there are several fairly safe models out there and that they do offer some exceptional safety benefits such as safer emergency landings, so I do believe they should be included.

Comment NO: 1361	User Name: knight starr

No Comment

Comment NO: 1376	User Name: dhansen

No Comment

Comment NO: 1385	User Name: wolfsdens

No Comment

Comment NO: 1412	User Name: humair14

No Comment

Comment NO: 1445	User Name: Goflyslow2

I agree that Gyroplanes should be excluded. If a gyro fits under part 103, it is already excluded. A gyro that does not fit under part 103 is then an aircraft. As such, requires registration and certification (experimental). The Popular Rotocraft Association (PRA)holds an exemption for experimental aircraft training for hire (#5209) This exemption should remain and continue to be granted. The FAA granted this exemption with the statement "in the interest of safety" Circumstances that prompted this exemption have not changed. The PRA should also request and be granted an exemtption to part 103 for dual instruction in two place gyroplanes meeting the requirements of already exempted ultralight trainers (excluding stall speed obviously) For those wishing to fly a gyroplane that fits the Part 103 definitions or exempted trainer, a medical certification is not required. I suggest that PRA promote their endevors via the above. It has served the ultralight community well and has introduced the joy of their sport to thousands while being commercially viable and safety oriented. The "no medical" aspect of this proposal is the only thing that is propping it up. It is destined to the same outcome as NPRM 95-11.

Comment NO: 1475	User Name: sleepy

No Comment

Comment NO: 1476	User Name: sleepy

No Comment

Comment NO: 1514	User Name: gyro jim

gyros should not be excluded because unlike helocopters the gyro is a very simple aircraft. it is also less complicated than an ultralight fixed wing aircraft. the rotorblades are always in autorotation and can be landed just about anywhere.i thank gyros (should) be included in this sport pilot category. thanks

Comment NO: 1522	User Name: bjmoore

I have no understanding of the issues of sport pilot in relation to gyrocraft. I can however, provide an outsider’s view on the issue. It is my intention to communicate that this rule attempts to encompass such a wide variety of aircraft, that it becomes too complex and cumbersome. If the FAA’s intent is to allow for all types of flying machines that fall within the limitations proposed, the complexity of gyrocraft (as stated in the NPRM) does not seem a justifiable reason to exclude them from the rule. I have seen gyrocraft and do not agree with the statement of non-inclusion due to complexity. Here we have a rule that desires to be inclusive of such a wide range of aircraft, from the 25 mph simple powered parachute, or hot-air balloon, to the 132 mph Zenith aircraft. It is obvious by inspection that the rule is much too ambitious in the scope of aircraft it regulates. Therefore its complexity is not enamored by those flying the lower performance aircraft

that will be encompassed. The non-inclusion of gyrocraft and all provisions of the proposed rule is not logical on the basis of complexity, while such a stark difference in complexity can be shown between other aircraft types encompassed by the rule. If the FAA desires to include some of us that meet the criteria, then the FAA should include all of us. My preference would be to include less of us, especially those of us flying aircraft that meet the speed and weight limitations found within the ultralight exemption limitations.

Comment NO: 1543	**User Name: Bill Bardin**

No experience, no comment.

Comment NO: 1553	**User Name: llhoedl**

If you have the skill to fly it. You should be permited to do it.

Comment NO: 1570	**User Name: ultraj51**

I generally agree but think faa should reconsider for later addition

Comment NO: 1599	**User Name: harveyking**

Gyroplanes are among the simplest of A/C. They have a very good mechanical record. We have good blade manufactures in this country. The reason for a high pilot error accident rate could be the unavialablity of trainers. The FAA should take a leadership role in encouraging the devopment of a more proactive training network. As far as standardization, most gyroplanes are alike.

Comment NO: 1604	**User Name: davidbauch**

No Comment

Comment NO: 1636	**User Name: live2av8**

YES, they shouldn't be excluded anywhere, especially regarding instruction. Even though gyros may lack standardized, recognized design, performance and handling criteria, in my opinion so do most ultralight airplanes, trikes, and powered parachutes. What makes these categories eligible seems to be the availability of training. I'm contemplating flying gyros and don't consider them any more complex than many airplanes I've flown. Availability of quality instruction has been the drawback. -live2av8-

Comment NO: 1640	**User Name: JSTO1**

A brief look at the existing technology demonstrates that the current gyroplanes on the market are not inherently complex. They incorporate an underhung teetering rotor with simple pitch and roll control. The PRA has provided data to allow analysis and incorporation of gyroplanes. While I personally would like a viable tractor design, the current offerings are appropriate for inclusion in the special, light-sport category aircraft certificate. I have am a 600+ hour fixed wing private pilot, with one forced landing, and have also flown (1 hr) the RAF gyroplane. I would have loved to have it's short landing capability when I put N56118 into Everglades national park. The capabilities of the pilot and his training are the key in either a gyroplane or any other sport plane candidate. The landing and stall speeds determine if one walks away from a planned or forced landing. The gyroplane matches or exceeds all the other candidates capabilities so they should be included. The inclusion of gyroplanes in the Sport Plan classes offers an opportunity to expand the number of designs and increase the availablity of training related to this technology.

Comment NO: 1662	**User Name: TOMS**

No Comment

Comment NO: 1688	User Name: bliddel

The gyro-plane is decidedly simpler than a helicopter, and cannot hover (in spite of the beliefs of some tower controllers)! The PRA has provided data to allow analysis and incorporation of gyroplanes into the Sport Pilot class. The capabilities of the pilot and his training are the key in either a gyroplane or any other sport plane candidate. The landing and stall speeds determine if one walks away from a planned or forced landing. The gyroplane matches or exceeds all the other candidates' capabilities, therefore gyroplanes should be included in this sport pilot class. Such inclusion would offer an opportunity to expand the number of designs and increase the availability of training related to this promising technology.

Comment NO: 1725	User Name: f272v4

First, I will admit I am new to the sport and am currently studying which type of aircraft I want to purse. Just looking at the sport aircraft (experimental) category I first see that the fixed wing aircraft's are small in size and lack in weight. This tells me that wind will always be a factor in flying days especially crosswinds. My recent leanings have been that the Gyro is less susceptible to wind and in fact talking to experienced pilots they like windy days. So, as the FAA looks at holdbacks they should also consider strong points. I am for the Gyro being part of the "Special, Light Sport Aircraft category"

Comment NO: 1729	User Name: DaveMartin

Gyroplanes should be included in special light-sport category. As a former airplane, glider and instrument CFI, I became acquainted with gyros by finishing and flying a Bensen GyroGlider and the getting training from Ken Brock, Farrington Airpark, and Steve Graves. Here are two impressions that may be helpful:

Comment NO: 1731	User Name: DaveMartin

I disagree that gyroplanes should be excluded from special light-sport category. I am a commercial airplane and glider pilot and a former three-rating CFI who has built and flown a towed gyro glider. I also took training from some well-known gyro pilots and instructors (Ken Brock, Farrington Airpark, Steve Graves) and have flown a number of gyros both dual (with an instrucgtor or checkout pilot) and solo. Here are two perspectives: 1. Gyroplanes are mechanically simpler than most other categories of aircraft including all airplanes. Excluding gyros on the basis of complexity does not make sense. 2. Special, highly qualified training is needed to fly them safely. That is because they fly like no other aircraft including helicopters. Example: Reacting to a sudden power failure in a gyro as if it were an airplane is likely to be fatal at any altitude. (Pushing the nose down aggressively in a gyro may reverse the disk airflow, causing sudden rotor speed decay or even breakup of the rotor.) Sport gyros are also more sensitive than most aircraft..especially in pitch, which can lead to pilot-induced oscillation. Yet with proper training--even for those who have thousands of hours flying fixed-wing aircraft--gyros have the potential to be the safest of all sport aircraft. They don't stall at any speed, they are easy to land at touchdown speeds of less than 15 mph, and they are less susceptible to high wind and gusts. They should be accommodated like the other currently proposed categories.

Comment NO: 1745	User Name: gyrochuck

My Ratings: Private Pilot Airplane Single Engine Land -1100 hrs, 250 hrs. of which would now be considered to be in the Light Sport Category Rotorcraft-Gyroplane - 60 hrs. Basic Flight Instructor F/W, Gyroplane thru ASC 110 hrs. 1.) Because gyroplanes could not be certificated under § 21.186, they would not be eligible for airworthiness certificates under § 21.191(i)(2) and (3). This would mean after three years, training for gyroplanes would not be available, except under exemption 5209. And it is unknown at this time if the 5209 exemption will be continued. This will severely compromise the safety of people attempting to learn to fly gyro's. If adequate training is not available people will attempt to self teach themselves. Although gyro's are relatively easy to fly once mastered. The initial learning is the hardest part and the learning curve is much safer with qualified instruction. I support a consensus standard for gyroplanes and they be included in Light Sport certificated aircraft. 2.) An aircraft issued an experimental, operating light-sport aircraft

airworthiness certificate under proposed § 21.191(i) would be issued operating limitations under current § 91.319(b) as part of the certificate. Under the current NPRM, these vehicles will no longer be usable for commercial flight instruction after 36 months of the publication of the final rule. This will cause my original investment to become nearly worthless for it's original purpose. Because of the financial burden of having to purchase a new aircraft I will have to give up instructing in gyro's. I dispute the need to do this, and strongly recommend the retention of the training privileges for compensation past the 36 months. I recommend this be reconfigured as a SFAR that states the light sport aircraft could be used for compensation for training only, but not for hire as a rental aircraft. I feel from a safety standpoint the current inspections put in place by the Ultralight organizations for it's 2 place-training exemptions are adequate. Since the NPRM considers the current aircraft are safe for training for 36 months (with inspections), I see no reason from a safety standpoint these aircraft (with scheduled inspections) can not continue to be used for compensation for flight training only. The results of the above 2 items will be fewer training options and little expansion, if any of the gyro instructor base

Comment NO: 1791	**User Name: steve.stefanic**

I am a fixed-winger, but I have friends flying gyros & I have had a couple of introductory rides. In my opinion, if you allow them to fly UL gyros, a step up to a "light Sport Gyro" would be well within their capability, especially with a training requirement similar to the one for fixed-wing Sport Pilot.

Comment NO: 1828	**User Name: megamouse**

Hours, and training requirements could be readily adjusted to meet the demands of gyroplanes. Powered parachutes are a lot simpler than other types of aircraft, so the idea of different levels of training appropriate to each catagory is already considered. The FAA has a responsiblity to the public to have a few experts in this area who can write a good set of standards.

Comment NO: 1834	**User Name: kpcp**

Keep gyroplanes excluded for reasons given. If the gyroplane industry can propose design safety constraints for FAA consideration, the FAA should take separate and appropriate actions at that time.

Question Number 9 - The FAA proposes that the ready-to-fly and kits for light-sport aircraft comply with an industry-developed consensus airworthiness standard in lieu of incorporating these standards into the regulations. This permits the light-sport aircraft industry to demonstrate that it has reached a significant technical level of maturity by developing and publishing its own aircraft design and production standards. By participating in the industry sponsored consensus standards group, the FAA supports developing and updating an effective set of standards with minimum impact on FAA resources. Do you believe the FAA should incorporate the standards into 14 CFR? Why or Why not? What alternative would you propose?

(9) The FAA proposes that the ready-to-fly and kits for light-sport aircraft comply with an industry-developed consensus airworthiness standard in lieu of incorporating these standards into the regulations. This permits the light-sport aircraft industry to demonstrate that it has reached a significant technical level of maturity by developing and publishing its own aircraft design and production standards. By participating in the industry sponsored consensus standards group, the FAA supports developing and updating an effective set of standards with minimum impact on FAA resources. Do you believe the FAA should incorporate the standards into 14 CFR? Why or Why not? What alternative would you propose?

Visited: 192	**Total Comments:** 88	**Last Post:** 5/6/02

Comment NO: 33 **User Name:** delta2ul

I would like to see this program succeed. I hope that the light aircraft industry can produce acceptable standards and prevent the need for the FAA to do it for them. FAA is offering an opportunity to the industry that I hope thay will be able to take advantage of.

Comment NO: 70 **User Name:** flyfree

There has to be some way of setting standards or what's the point?

Comment NO: 85 **User Name:** Bradley

No Comment

Comment NO: 101 **User Name:** artspain

I believe this can be an effective way to develop standards without an undue burden on industry or government.

Comment NO: 115 **User Name:** Bill Cartwright

I believe you have to get a consensus 1st as the program will start 4-29 @ Oshkosh. I will be suprised if you get any 2 people to agree on anything as each has different requirements.The agility if UL's is miles different from GA so seperate standards would be needed for a tractor over a pusher type of plane. Thsi is going to be the Pandoras Box of Sport Pilot and next year we might have an agreement so we could move forward on this and start the 3 year clock then ...Maybe..

Comment NO: 125 **User Name:** w1bfn

No Comment

Comment NO: 143 **User Name:** daberti

With the limitations imposed on light-sport aircraft for speed and weight the consensus on a set of

standards should be easy to meet. Safety should be paramount and an easy marketing tool for manufacturers.

Comment NO: 160	**User Name: barnesrc**

I agree with the proposed rule. The proposed rule alows flexibility and there are enough manufacturers of light sport aircraft to police itself. If problems arise, then deal with them. Don't mandate ahead of time.

Comment NO: 176	User Name: Ultraliteteacher

If the choice is between General Aviation standards and the consensus standards, the choice must be consensus. However the likelyhood of an industry standard being both meaningful enough to matter and not so limiting as to destroy innovation is not great. Either you have a standard so loose that you have wasted you time, or you have one that is too tight and will actually impede safety. Far simpler to rely on the already overactive court system to compel manufacturers into doing 'the right thing'. If they use cheap stuff, they will be killed in court. No need for regulations to add to this. My alternative is to allow the legal system, particularly negligence, to accomplish this stated task. If the FAA simply looks at the realities of the manufactiurers today, they will see that they are already doing a fine job. Why divert their precious resources to such folly.

Comment NO: 200	User Name: sthomason

The industry is very liability sensitive and does not want to miss its golden opportunity to thrive by producing unsafe, unstable, unpopular, and expensive designs. Such self-regulation has worked before. The ASTM, EAA, and small aircraft kit manufacturers are already preparing to develop such a standard. I firmly believe that safety is foremost on the industry's radar. They cannot be successful if their customers and the general public perceives them as producing unsafe aircraft. Government regulation of small certified aircraft have only made flying more expensive and pilot error is still the largest killer of pilots and passengers in small aircraft, not manufacturing or design problems.

Comment NO: 208	User Name: capella1

We do not beleive the consensus standards should be incorporated in the CFR. To do so may impead the ability to make future alterations. The "Consensus Standards" should simply be referenced as applicable but should not be a fixed part of the rule.

Comment NO: 217	User Name: Batson

I believe the industry has matured to a point they can do a good job of developing and implementing such standards. With FAA monitoring I believe it will work without incorporation in 14 CFR.

Comment NO: 253	User Name: E002SA

By not incorporating the standards, the FAA allows the industry to make safety enhancements as necessary without requiring the FAA to codify it. Even so, the FAA should have a person who participates in the standards, and should ensure that the process is not usurped by a few companies to preclude others from the market without good cause. Many of the best ultralights are foreign, and it would be a loss if they were no longer allowed into the US.

Comment NO: 275	User Name: Barac

Yes, however, I think there should be some type of provision for existing factory build aircraft, that would meet the eventual consesus standards to be approved for Special-LSA certification. Hopefully, there can be a provision for minor modification with manufacturer approval, so that people can customize and aircraft while not effecting airworthyness.

Comment NO: 300	User Name: deeph2o

I want lots of rules and control over things flying over my head, even when I am out in the country.

Comment NO: 329	User Name: challengerpilot1

I agree these planes have been flying safely for years. I would think they would only be better if factory built. This method will allow the factories to help keep the cost down.

Comment NO: 360	User Name: jwalters

ONLY IF IT WILL NOT COST MILLIONS TO CERTIFY THE A/C. THE FAA ALREADY HAS RULES AND LIMITS ON ALL A/C CONSTRUCTION,X-OR NOT, FOLLOW THESE GUIDELINES FOR METAL OR PLASTIC PLANES AND HAVE THE MANUFACTURER DO A MINIMUM OF ONE HUNDRED OBSERVED FLIGHT TEST HOURS IN ANY CONCIEVABLE AIR TO PROVE HIS DESIGN

Comment NO: 361	User Name: jwalters

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Comment NO: 398	User Name: bobkat

Yes, there are no "industry standards" even now for kitplanes, yet the manufacturers all seem to agree on a basic level of safety and airworthyness. I think that they will do a pretty good job of setting standards and "self policing" for their own good.

Comment NO: 401	User Name: bobkat

Yes, there are no "industry standards" even now for kitplanes, yet the manufacturers all seem to agree on a basic level of safety and airworthyness. I think that they will do a pretty good job of setting standards and "self policing" for their own good. In the early years of ultralights there was some poorly built, poorly designed stuff out there, but nowadays you never seem to hear of a schmuck because of design or material. I have been impressed when looking at kits these days - good design, proper AN bolts, aircraft grade material, etc.

Comment NO: 407	User Name: wjwil

No Comment

Comment NO: 408	User Name: wjwil

No Comment

Comment NO: 422	User Name: ch900

Do not incorporate in regs. This will allow required flexibility. Keep as written.

Comment NO: 439	User Name: hawkul

Before we can decide anything about these standards we need to see what they say. These standards should have been drawn up BEFORE the NPRM was issued. If made a part of 14 CFR it will be nearly impossible to get changes made in them when needed. Let the industry police itself as much as possible.

Comment NO: 490	User Name: Steve

I belive this would not be nessesary. All the mfg's are doing a pretty good job. conforming to a industry std. Most inovations and advanced delelopments are coming from the experimental industry now.

Comment NO: 492	User Name: kepfordj

Regs are to inflexible to change. Just look what it did to GA.

Comment NO: 493	User Name: kepfordj

Regs are to inflexible to change. Just look what it did to GA.

Comment NO: 502	User Name: William G. macIntyre

No Comment

Comment NO: 518	User Name: Taylorcraft078

No Comment

Comment NO: 547	User Name: 584241

If Letting the industry establish the standards and the FAA does not have to spend any money gives you a warm feeling, then let them do it. I think the industry could do a less intrusive job, and do it faster. There should be an annual review of the standards by the industry and the FAA. The FAA input would be accident/incident information. Pilot error data would be deleted, whats left would validate the standards.

Comment NO: 588	User Name: aeromac

Let the industry set the standard. When changes need to be made they can be changed quicker, thus keeping things safer.

Comment NO: 594	User Name: goluscombe

I agree with the proposal. I feel the sport aircraft industry will be up to the task of setting excellent standards. The makers of "standard" experimental aircraft and the safety record of experimental aircraft, from my understanding, is very comparable to the factory-built bretheren. Given the excellent quality of homebuilt aircraft flying now built by the individuals, I feel confident that the upcoming sport aircraft will be more than prepared to self-regulate.

Comment NO: 616	User Name: cec1155

Leave this alone. The industry is already working on standards for kit manufacturers. It is beneficial to them to regulate themselves for safety.

Comment NO: 660	User Name: glaunt

I barely agree here....i would give the standards plenty of time to evolve...let the conclusions be revised a few times before part of 14 CFR

Comment NO: 678	User Name: stewart

No, I do not believe that the FAA should incorporate these standards into 14CFR. This would result in higher costs for the aircraft manufacturers and would be passed on to the buyers.

Comment NO: 695	User Name: mccoy3

Industry standards accepted as codes work well. Examples are building codes, The National Electric Code and the various other industry standards. It protects the public and reduces costs to develop. They do have a tendency to stay more current with technology that governmenet developed regulation.

Comment NO: 713	User Name: Steve

I belive the industry has developed enough that it could show some of our old standards alot.

Comment NO: 741	User Name: towpilot

This approach has worked extremely well for the Hang Glider industry and resulted in the Hang Glider Manufacturer's Association (HGMA). This excellent industry organization promulgates and updates viable manufacturing and testing standards that have resulted in very well engineered and safe hang gliders with a minimum of FAA oversight. Incorporation of light sport airworthiness standards into 14 CFR should not be necessary and both the light sport aircraft industry and the FAA would be better off and happier without such incorporation. For one thing, incorporation would require many new FAA personnel as already overworked maintenance inspectors could never adequately carry the additional burden. Let the light sport aircraft industry handle it just as the hang glider manufacturers have been allowed to handle their own standards.

Comment NO: 776	User Name: Rich Wallin

The sport plane industry has proven itself. Let them fly.

Comment NO: 833	User Name: gkrug

While I agree, it should be appreciated that concensus standards like ANSI, NFPA, Etc. are time consuming at the offset. I have been on ANSI safety committees which are represented by manufacturers, users, the public, government agencies, the military, etc. The work well so long as there is fair representation and they are not slanted toward some self-serving faction or group. As a user I would gladly volunteer to be on such a committee as a user.

Comment NO: 851	User Name: David Hodgson

Are 200m/hr kitplanes like RV6's manufactured under a consensus standard? Why not get an airworthyness certificate for light sport kits as well?

Comment NO: 884	User Name: whiteman

I feel that the standard should be published and be widely available, but to incorporate them in the body of regs is asking for trouble. In the initial time frame it would be an advantage to maintain some flexability in the standards. Allow some time for the standards to mature.

Comment NO: 888	User Name: frjn33

By incorporating the standards in a federal regulation, you are potentially strangling future development and creativity. Get the industry leaders together like you did with ARAC and hash them out.

Comment NO: 904	User Name: tbrandt

No, the standards should not be explicitly incorporated into 14 CFR but rather incorporated by reference and then use the Advisory Circular System.

Comment NO: 921	User Name: Gator

I agree but there should be caution. A reg for Manufature A could be the death of another. USE CAUTION and LOGIC!

Comment NO: 938	User Name: Flyguy

No Comment

Comment NO: 951	User Name: SoccerPilot

Being an ultralighter, I feel the only group to really benefit from this regulation will be the insurance companies. This will increase the cost of a kit-plane significantly. The UL community has done an outstanding job over the years of policing itself without excessive regulation. FAA has complimented the USUA on how well it has done. Manufacturers of kit-plane ultralights have significantly improved safety and design on their own. The consumer buys the better plane, thus supply and demand accomplish far more than any regulation will. In addition, it keeps the price down. It takes a act of God to change a reg once its in. Has FAA updated the weight ang gas restrictions to Part 103 in the past 15 years to keep up with the safety improvements done by the manufacturers? (i.e. heavier tubes, heavier dacron, braking systems, tires, ballistic parachutes, more reliable engines, etc.)

Comment NO: 963	User Name: dfreeman

I believe that if the light sport aircraft industry can develop its own design and production standards, then it would also be able to maintain those standards without the requirement for more FAA regulations. I would propose a continuance of the “consensus committee” made up from representatives of the manufacturers, the associations, and the FAA that oversees the continuity and continued enhancement of the “standards” without unnecessarily and continually increasing the regulatory burden. This group would strive for improvements through the implementation of new production techniques, methods and materials. This would make a lot more sense to me than casting the future of light sport into stone by locking current methods and materials into more FAA regulations that will only drive the costs up until only those with an endless supply of discretionary funds can participate. We already have that problem with “standard category” aircraft certification, so why create another one just like it?

Comment NO: 964	User Name: Spdrflyr

The only problem with this is that it will take many years to develop a consensus standard for every Make and Model...just too damn many of them out there. Go ahead with the Sport Pilot CErt first...and then if you EVER get around to the LSA Cert...Oh Well!

Comment NO: 986	User Name: kcmalls

Concensus standards is the way to go for simple, non-complex aircraft. Try self regulation first.

Comment NO: 1008	User Name: johnhenderson

Industry standards are a great idea. I do not think they should become codified regulations because then they could not be changed easily to adapt to changing technology. Industry standards could be able to evolve over time.

Comment NO: 1039	User Name: RFI

I agree with an industry-developed consnesus standard. It works for Ultralight and Primary category manufacturers and it should work as well with Light Sport Aircraft. I see no reason to burden the FAA with the job of policing something that can be handled better by industry.

Comment NO: 1058	User Name: terryo

The materials and methods of fabrication are constantly changine, why incorporate into regs procedures that WILL improve.

Comment NO: 1082	User Name: gyrobee

No Comment

Comment NO: 1097	User Name: bruce2

I agree If certain designs and standards for power to weight and structural integrety can be developed and proven it should sufice to develop an air frame /power plant combo worthy of some type of certification

Comment NO: 1115	User Name: fatplane

I agree that some consensus must be arrived at. How you get there is going to be a tremendous undertaking by industry, with over 250 models of aircraft. If you require "full certification', a lot of mom and pop manufacturers are going to be put out of business. I think you have to be careful not to stifle creativeness on the part of the designer.

Comment NO: 1146	User Name: 21214

Let the market decide. The safe designs that already have a track-record should be allowed to develope their own production standards. New designs should be required to meet a very limited number of basic design requirements (Like power to weight ratios etc)

Comment NO: 1150	User Name: rotopup

While this "sounds" good, it may be much more difficult to fairly implement.

Comment NO: 1160	User Name: Gyroman

I agree --I dont see any reason for the FAA to get more involved than is necessary

Comment NO: 1189	User Name: heronium

this extra cost will push the cost up so high no will be able to afford an aircraft. this will cause several co. to go out of the lite aircraft bussness

Comment NO: 1193	User Name: jonvee

No Comment

Comment NO: 1228	User Name: PWPlack

There are two questions here - I agree with allowing the industry to set standards, DISAGREE that those standards should be written into part 14. Most of the recent innovation in light sport aircraft has come from manufacturers of experimental kitplanes, while certificated aircraft

generally rely heavily on 50-year-old base technology. This suggests that letting the industry keep the standards, and move them with time and technology, will best serve the needs of safety and technological advancement.

Comment NO: 1235	**User Name:** **helitim**

No Comment

Comment NO: 1274	**User Name:** **James48843**

We support consensus standards, however, the rule should make clear who and how the standards are developed, and that more than one standard may meet the rule, such as the case in Primary Category, where an applicant may propose a standard, and have the FAA adopt the standard. One way, but not he only way, may be for a body to be established to review and approve proposed "consensus standards" at regular meetings. The body should include FAA representatives, as well as primarly headed by industry teams. The FAA reps only serve as advisors.

Comment NO: 1295	**User Name:** **Goflyslow2**

I Disagree. Standards are already in place for type certificated and experimental aircraft. A lowering of standards is not in the best interest of the public.

Comment NO: 1334	**User Name:** **RTHOMPSON**

I agree, Let the industry set the standard. The light aviation market supports the best and safest aircraft. When changes need to be made they can be changed quicker, thus keeping things safer.

Comment NO: 1362	**User Name:** **knight starr**

because of the explosion of new materials and techniques available in building light airplanes, I do not think it reasonable to try to standardize a criterium. The word gets out quickly among the flying community of what is safe and unsafe, and reviewing magazines such as Kitplanes, EAA Experimenter, and Ultralight Flying! also closely look at new models and fly them.

Comment NO: 1368	**User Name:** **sam**

No, the industry standards should not be written into the regulations. The experimental industry has done an exceptional job of developing and bringing to the market some outstanding designs. The industry should take it upon itself to grab this opportunity and run with it. This is the only way, IMHO, that Sport Pilot will be the success that all of us who support it are hoping for. If the industry fails to develop meaningful standards and fails to police itself concerning the use of those standards, it's guaranteed that over-regulation will be the next step and, thus, the death-knell of this proposal.

Comment NO: 1387	**User Name:** **wolfsdens**

No Comment

Comment NO: 1478	**User Name:** **sleepy**

I feel that standards are good but should not be part of a regulation. It will result in much higher cost and slow down developement. Why not handle it in the same manner as experimentals?

Comment NO: 1523	**User Name:** **bjmoore**

This is another area where the rule becomes too complicated for it's own good. Such standards are not needed for an industry and community that is already flying safely. Consensus standards encumber this rule and if they are kept should only be applied to "special" light sport aircraft.

Comment NO: 1544	**User Name:** **Bill Bardin**

Yes, if they are good standards, not overly-regulating and heavy-handed as the ones which have helped in the demise of general aviation. My first alternative is to come up with some standards.

Comment NO: 1555	**User Name:** **llhoedl**

No Comment

Comment NO: 1572	User Name: ultraj51

If the industry does the job ok if not the faa will need to do it

Comment NO: 1580	User Name: dschach

No, do not incorporate the consensus standard into 14 CFR. The consensus standard is one of the best ideas in the NPRM. It is clear that regulations take too much time to implement and change. The ultralight industry is developing at a rapid pace. The fact that weight-shift and powered parachute aircraft have existed for so long and yet the FAA still does not have a category and class for them shows how slow the regulatory process is. This rule making process itself was started by a petition by USUA in 1988. Let the industry work out safe standards for recreational aircraft. That is the best way to promote innovation and ensure safe designs.

Comment NO: 1584	User Name: Catalina36

I am expressing no opinion primarily because of the way the question was phrased. As a California State Administrative Law Judge, Pilot and former Deputy Attorney General, I know how difficult it is to amend or change formal administrative regulations. I want to buy a safe aricraft with some assurance that the FAA has cecked it out, but I don't want inordinate delays in technological development bu the need for every change to g through the formal administrative rulemaking process.

Comment NO: 1606	User Name: davidbauch

No, this should be left to the manufacturers. The FAA should not interfere.

Comment NO: 1637	User Name: live2av8

NO, once again, ultralights (which is what the NPRM is suppose to be addressing) don’t need & have survived very well without such a standard. I can understand the manufacturers voluntarily complying with a consensus standard, but I don’t feel it should be mandatory in order to sell machines for the purpose of training or rental. In this age of the information superhighway, sour news regarding a manufacturer’s product or services travels faster than greased lightning across the nation. This current day method is likely more COST EFFECTIVE and safer to the end user, and more persuasive in getting the manufacturer’s to produce quality products and services than a consensus standard could ever hope to. -live2av8-

Comment NO: 1646	User Name: JSTO1

If these are to be truly concensus based standards then the FAA should not include them in 14 CFR. They should provide a repository for the standards and access to the information as a librarian. The alternative would be to have AOPA or EAA accept custody of the information. Access and change history should be thing FAA is concerned with.

Comment NO: 1683	User Name: john brady

I think that the LSA industry has demonstated that it can and will develop the Airworthiness Std of which the industry has done very well. Competition will promote & reward the LSA Mfgs that have their act together. They have waited a long time for this opportunity and with the cooperation of EAA, AOPA & FaA and the industry, this should work out.

Comment NO: 1702	User Name: roycaton

I am in favor of letting the industry set the standards for the LSA. The best and most advanced aircraft in the world are the home built experimental aircraft. It is in the best interest of the manufacturers to have safe, good performing aircraft. Give good old American engineering a free rein and we will have the best with the least cost.

Comment NO: 1757	User Name: BigSkyAviation

Making it easier for a manufacturer to certify a factory-built plane is fine. The cost to certify is one reason why customers buy kits and build themselves or have them built.

Comment NO: 1792	User Name: steve.stefanic

Yes, let the manufacturers set the concensus standards & self-regulate. It works in the UL world pretty well & it can function just as well in the "light Sport" category.

Comment NO: 1803	User Name: gldrboy

Why are we reinventing the wheel? We should adopt (perhaps with modifications) the JAR rules used throughout the rest of the world.

Comment NO: 1829	User Name: megamouse

Yes to use of industry developed airworthyness standards. Regulation should allow these, but also establish a basic overview of standard requirements. Industry standards should not be incorporated into 14 CFR, but rather should be shown as a method of compliance with overview requirements.

Comment NO: 1835	User Name: kpcp

Written comments were sent on May 4, 2002. Airworthiness standards (consensus or otherwise)are KEY to successful safety-by-design (Light-Sport aircraft included). My written comments directly address this KEY issue. I do believe that Light-Sport Airworthiness Standards (consensus or otherwise) should appear in 14 CFR Part 21 -- I worked with the NAPPF Industry to propose such standards for Powered Parachute Aircraft in 1998: 85 pages of standards; 15 pages of advisory materials. They could be significantally shortened if night flight was not desired.

Question Number 10 - The FAA is proposing that the manufacturer of ready-to-fly or kit light-sport aircraft comply with the consensus standard and attest to that fact on a manufacturer's statement of compliance. The proposal does not limit a manufacturer's ability to have an independent third-party organization audit this compliance. Do you believe the FAA should be making the findings of compliance? Why or Why not? What alternative would you propose?

(10) The FAA is proposing that the manufacturer of ready-to-fly or kit light-sport aircraft comply with the consensus standard and attest to that fact on a manufacturer's statement of compliance. The proposal does not limit a manufacturer's ability to have an independent third-party organization audit this compliance. Do you believe the FAA should be making the findings of compliance? Why or Why not? What alternative would you propose?

Visited: 163	Total Comments: 70	Last Post: 5/6/02

Comment NO: 34 **User Name: delta2ul**

No Comment

Comment NO: 59 **User Name: cbranagh**

The world seems to be going to ISO complience. Why not develope one for light sport aircraft?

Comment NO: 71 **User Name: flyfree**

Sure let the alphabet orgs do it. They've been doing a swell job so far.

Comment NO: 86 **User Name: Bradley**

No Comment

Comment NO: 102 **User Name: artspain**

I agree completely. Organizations such as EAA or AOPA can handle audit duties.

Comment NO: 126 **User Name: w1bfn**

The Consensus standard should specify who may specify and who may verify, but the FAA should consider making itself the arbiter of diagreements regarding certifiability of designs.

Comment NO: 144 **User Name: daberti**

The consensus standard should also specify the method of testing required for such standard. This way anyone could evaluate/demonstrate compliance. The FAA need not be involved!

Comment NO: 161 **User Name: barnesrc**

I agree with the proposed rule. If the FAA is making the findings of compliance, then it is adding one more bureaucratic hurdle and obstical for this proposed light sport aircraft industry. Competition between manufacturers will be adequate police on the industry.

Comment NO: 177 **User Name: Ultraliteteacher**

There should be nothing certified by the manufacturer. The point person for airworthiness is first and foremost the pilot. Second in charge is the owner. This is where true airworthiness is defined. There is no data to attest that a paper compliance statement will alter safety. Drop this topic completely until there is compelling data requiring this Draconian approach to airworthiness. The only winners of this rule will be the insurance companies that will burden the manufacturers with overpriced policies based upon a false sense of airworthiness.

Comment NO: 201 **User Name: sthomason**

The FAA does not have the manpower to do this, and currently lets the major aircraft

manufacturers to inspect themselves on their process. A large and well-respected 3rd party such as EAA, SAE or ASTM will be able to accomplish this.

Comment NO: 212 **User Name: capella1**

Liability exposure issues are more than enough to ensure that a manufacturer that signs a "Statement Of Compliance" has met the requirements. It should not therefore be necessary to add an additional administrative burden. This method has been tested and proven in Canada for several years now.

Comment NO: 218 **User Name: Batson**

Yes. The FAA should either attest to the manufactures adherance to the industry consensus standards or have a means of periodically monitoring the 3rd party who does.

Comment NO: 254 **User Name: E002SA**

I would expect the DAR inspecting the individual craft to make the finding of whether it is compliant.

Comment NO: 359 **User Name: bobkat**

Leave the FAA out of it - they have too many other things to do. Educate the public not to consider any kit or plane that does not comply to the industry "standard" and the buying public will atke care of it.

Comment NO: 363 **User Name: jwalters**

THE FAA SHOULD ONLY OBSERVE THE MANUFACTURERS TEST RESULTS, JUST PROVIDE A BASIC BUT THOUROGH OUTLINE OF FLIGHT TEST PARAMETERS. THE INSURANCE COMPANIES WILL DO TO REST.

Comment NO: 409 **User Name: wjwil**

No Comment

Comment NO: 441 **User Name: hawkul**

The standard should be a guide to the DAR that inspects each plane before it recieves an airworthiness certificate. Does the statement of compliance open the manufacturer up to more liability? If it does increase liability it should not be required since it will increase insurance costs but contribute nothing.

Comment NO: 495 **User Name: kepfordj**

I think industry would do a better job.

Comment NO: 497 **User Name: Steve**

I belive a third party could audit compliance.

Comment NO: 503 **User Name: William G. macIntyre**

FAA has many more impotant tasks... use 3rd party compliance audits.

Comment NO: 517 **User Name: Taylorcraft078**

The FAA should publish the standards and let outsiders perform the testing. The current program for experimentals seems to work well for testing and certification.

Comment NO: 549 **User Name: 584241**

The manufacturer should make the statement of conformity of the "design" to the standards. Quality control of production is another subject. The manufacturer should submit a design analysis, along with the statement of conformity, to the FAA for review/comment(not approval/disapproval).

Comment NO: 590 **User Name: aeromac**

Let the third party and the buying public drive the compliance standard.

Comment NO: 596 **User Name: goluscombe**

I disagree with qualifications. If the FAA finds that a manufacturer has not, in it's well-considered opinion, produced aircraft with due diligence with respect to design, flying qualities and strength, then I would not object to the FAA to subjecting the offending manufacturer to oversight. However, the industry could create a mechanism that would effectively do this job and report back to the FAA it's findings and what corrections were made. I would hope that public accountability will be a hallmark of the self-regulating sport aircraft industry which only enhance its reputation with the public.

Comment NO: 617	**User Name: cec1155**

Let industry police themselves. Regulation adds cost. The community is close knit enough that word will get out about shoddy work or non-comliance.

Comment NO: 661	**User Name: glaunt**

I think the FAA should reserve the right to have manufactureres substantiate their compliance with some documentation...either through analysis,empirical testing, and flight test reports...and the methods they used.

Comment NO: 679	**User Name: stewart**

No, I disagree. The manufacturers should police themselves. If a manufacturer is having proplems, any prospective buyer or owner will know about it very soon. News like that travels very fast.

Comment NO: 696	**User Name: mccoy3**

The tort lawyers will enforce it. FAA can save its money.

Comment NO: 742	**User Name: towpilot**

Unless the industry proves beyond reasonable doubt that it cannot police itself and its standards, the FAA should maintain a close working relationship with the Industry Association and do occasional spot checks to keep everybody honest but not expend valuable resources that could be used better elsewhere, such as air carrier compliance. Again, the Hang Glider Manufacturer's Association is an excellent example of an FAA/Industry partnership for safety that has worked extremely well. Such a relationship with sport aircraft manufacturers should result in the same high degree of compliance since nobody wins when someone is hurt or killed because of defective equipment. The growth of light sport aviation will be in large part due to the perception the public has of the relative safety of the aircraft produced and the manufacturers of these aircraft thus have a large stake in self compliance and seeing to it that others comply as well.

Comment NO: 834	**User Name: gkrug**

I agree, but this standard may be a long time coming even with the EAA being a driving force...

Comment NO: 885	**User Name: whiteman**

To put this requirement on the FAA is wrong. The FAA dosen't have the money or man power to to the job in a timely manner. i would favor third party approch to compliance. I farther belive that some help with liability problems be part of the over all approch to the compliance issue.

Comment NO: 889	**User Name: frjn33**

Third-party compliance should be sufficient. Manufacturers who wish to sell planes or kits to the public will have to show compliance or they will go out of business due to lack of sales.

Comment NO: 905	**User Name: tbrandt**

No. It adds to cost and time. Yet the FAA could act in exceptional cases where problems are evident.

Comment NO: 939	**User Name: Flyguy**

No. Let the industry regulate itself. Nobody wants to see customers killed.

Comment NO: 965	**User Name: Spdrflyr**

No Comment

Comment NO: 968	User Name: dfreeman

I support the independent third-party organization approach. If the industry can properly design and market efficient and cost effective products, and meet the consensus standard requirement, then they can just as easily maintain that compliance. The "market" or "buying public" will be able to easily determine those who may try to circumvent the system.

Comment NO: 1019	User Name: Harold E. Thomas

This sounds reasonable to me.

Comment NO: 1040	User Name: RFI

I think it might tax the FAA's workload if it tried to do all the work. The DPE and DAR concepts seem to be working pretty well, so why not let an independent third party make the determination.

Comment NO: 1110	User Name: Flymo

The workload alone would be a problem. An FAA overview of a third party body or bodies would work better.

Comment NO: 1116	User Name: fatplane

Are you going to require that the designer for each company be a fully certified engineer in the specialties involved? Or don't you have to be as long as you can interpret the 'consensus standards"?

Comment NO: 1147	User Name: 21214

The FAA is not equipped to do this. Right now I can't even find an AW inspector for my gyroplane, so how could a manufacturer of a sport aircraft kit ever hope to do so. The DPE and DAR concepts seem to be working pretty well, so why not let an independent third party do the inspections.

Comment NO: 1153	User Name: rotopup

Sounds like open invitation to product liability lawsuits. I think most manufacturers will automatically comply due to competition from other manufacturers. The industry will evolve its own "standards". Safety will be on the top of the list because the buying public will demand it.

Comment NO: 1154	User Name: rotopup

Sounds like open invitation to product liability lawsuits. I think most manufacturers will automatically comply due to competition from other manufacturers. The industry will evolve its own "standards". Safety will be on the top of the list because the buying public will demand it.

Comment NO: 1161	User Name: Gyroman

Third party inspections appear necessary as I dont think the FAA has the ability to handle this

Comment NO: 1190	User Name: heronium

because every thing the goverment gets into it screws up big time

Comment NO: 1194	User Name: jonvee

No Comment

Comment NO: 1230	User Name: gyrobee

If the experience of the Hang Glider industry is any guide, there is no reason why manufacturers certification cannot be largely self-policing. If there appears to be a lack of congruence with the consensus standard in a specific case, the FAA can look into the matter in an enforcement context. Such a system would significantly reduce the numnber of FAA personel tasked with Sport Pilot compliance matters.

Comment NO: 1232	User Name: PWPlack

A manufacturer's statement is adequate. The overwhelming prospect of litigation will discourage falsified compliance statements.

Comment NO: 1237	User Name: helitim

No Comment

Comment NO: 1301	User Name: John Ross

No. We have an aggressive legal profession. They'll keep the manufacturers honest far better than any gov't agency with rules concocted by people with no personal stake in the issue.

Comment NO: 1335	User Name: RTHOMPSON

No Comment

Comment NO: 1388	User Name: wolfsdens

No Comment

Comment NO: 1413	User Name: humair14

No leave that up to the industry.

Comment NO: 1479	User Name: sleepy

No Comment

Comment NO: 1524	User Name: bjmoore

Adds an unnecessary step in an already cumbersome process of DAR inspection, flight testing period, n-numbering, registration, etc. Not needed.

Comment NO: 1545	User Name: Bill Bardin

For nearly 20 years the USUA has administered the ultralight training program with an outstanding safety and success rate. So successful that the growth of sport aviation is growing extremely fast. On the other hand, the FAA has administered the general aviation program with a mediocre safety and dismal success rate. So dismal that general aviation has been dying for the last 30 or so years. It seems obvious that the USUA should be the administrative organization for light-sport aircraft, and report to the FAA.

Comment NO: 1556	User Name: llhoedl

No Comment

Comment NO: 1573	User Name: ultraj51

If the industry will great if not faa is the fall back

Comment NO: 1585	User Name: Catalina36

Absolutely! If someone wants to marked a finished aircraft or a kit in the US, it should have an FAA certificate that attests to its airworthiness or otential airworthiness. And by the way -- can we find another name for homebuilt aircraft othe than "experimental?" This name is really stupid and non-descriptive. How about "amcon" for amateur constructed?

Comment NO: 1607	User Name: davidbauch

No, this should be left to the manufacturers. The FAA should not interfere

Comment NO: 1638	User Name: live2av8

NO, once again it’s not needed regarding ultralights. See my response to question 9. -live2av8-

Comment NO: 1648	User Name: JSTO1

The FAA should accept a certification of compliance from a third party. This could be implimented like to current ISO standards for Quality and Process controls. FAA could reserve the right to audit compliance if there is a question between the manufacturer and the third party evaluator. This should keep both of them in line.

Comment NO: 1665	User Name: TOMS

No Comment

Comment NO: 1684	User Name: john brady

Maybe FAA could review the consensus of the industry but not have ADs, etc.

Comment NO: 1689	User Name: bliddel

The FAA already has its hands full, and is not equipped to do this. The DPE and DAR concepts seem to be working pretty well, so why not let an independent third party do the inspections? Allow the free market to do its thing and you will be pleasantly surprised every time. FAA bureaucrats who disagree with capitalism might rather live in Cuba? The overblown product liability tort system in our country will keep even the "almost perfect" company from ever profiting by cutting any corners with respect to safety.

Comment NO: 1703	User Name: roycaton

It is in the best interest of the manufacturers to put out a safe product. The current kit manufacturers produce some of the best and most advanced aircraft in the world.The question of a second party audit and who performs that audit should be left up to the manufacturer. The FAA may perform that audit, but it should not be the only option.

Comment NO: 1770	User Name: edburkhead

I think the FAA should NOT be the ones to make findings of compliance. I'd like the FAA stay out of the process of making the findings of compliance. I'd like to fly planes designed with performance, the market and personal responsibility in mind. I'm sorry to say, I have not been sufficiently impressed with much of the FAA's regulation of certificated aircraft. Too many times, I've seen instances of the FAA's people rejecting safety improving aircraft changes. It is widely thought that as the FAA people who KNOW about general aviation age and retire, they're being replaced by bureaucrats who value their careers far higher than the good of aviation. I think this, too. Interpersonal communications via usenet, mail lists and the web, taken with the traditional magazines and other media, give us the opportunity to learn about various planes. This was not possible 50 years ago. It enables pretty effective stomping on irresponsible builders.

Comment NO: 1793	User Name: steve.stefanic

The FAA need not be the one making the findings of compliance. It is in the best interest of the Manufactures long term business health to insure compliance. The word gets out fast when a Manufacturer is falling short on compliance. The best judge of compliance is the paying customer. If it is an "edsel", they won't buy it. Free market still works, especially when the life of the buying pilot depends on it.

Comment NO: 1830	User Name: megamouse

Manufacturer should be allowed to show, why deviations from the industry acdcepted standards are appropriated for the specific design of aircraft. This is a good way to promote design improvements. FAA should audit findings, and audits should be public documents. FAA need to be involved in this or they will lose the needed expertise.

Comment NO: 1836	User Name: kpcp

I believe that the FAA should hold responsible those persons who sign a Statem of Compliance. Signers, read the applicable regulations carefully!

Question Number 11 - In the proposal, the FAA has stated that, for ready-to-fly or kit light-sport aircraft where there is a safety-of-flight issue that is not being remedied by the manufacturer (or their successor), certificate action could be taken against the individual aircraft owner (i.e. the aircraft could lose it's airworthiness certificate). The FAA would have to do this because of its responsibility to the public to maintain safety in air commerce. Do you agree with this approach of holding the individual aircraft owner responsible for the airworthiness of the aircraft? Why or Why not? What alternative would you propose?

(11) In the proposal, the FAA has stated that, for ready-to-fly or kit light-sport aircraft where there is a safety-of-flight issue that is not being remedied by the manufacturer (or their successor), certificate action could be taken against the individual aircraft owner (i.e. the aircraft could lose it's airworthiness certificate). The FAA would have to do this because of its responsibility to the public to maintain safety in air commerce. Do you agree with this approach of holding the individual aircraft owner responsible for the airworthiness of the aircraft? Why or Why not? What alternative would you propose?

Visited: 150	Total Comments: 79	Last Post: 5/6/02

Comment NO: 36 **User Name: delta2ul**

I agree that the individual aircraft owner is ultimately responsible for the airworthiness of his aircraft. Any system that would allow an owner to avoid this responsibility should not be allowed. I cannot emphasize how strongly I feel about this: THE AIRCRAFT OWNER IS TOTALLY RESPONSIBLE FOR THE AIRWORTHINESS OF HIS AIRCRAFT!

Comment NO: 60 **User Name: cbranagh**

I agree. These sport aircraft are mainly a risk for the pilot and occupant and therefore the owner operator should be responsible for their planes airwortiness.

Comment NO: 72 **User Name: flyfree**

Absolutely YES!

Comment NO: 87 **User Name: Bradley**

No Comment

Comment NO: 103 **User Name: artspain**

AGREE

Comment NO: 112 **User Name: Bill Cartwright**

It's a good idea but I think the Legal system could hold it up for years before any actions could be taken. By then it would have allowed many planes thru with knowledge of the hazzard.Word it so the Manufacture could be brought suit on after the initial complaint had been filed. This would make the process flow and get rid of bad manufactures with only Money as their objective instead of making a honest good product for an honest good price.

Comment NO: 127 **User Name: w1bfn**

No Comment

Comment NO: 145 **User Name: daberti**

An issue such as this affects all aviation and would be justified. However, I don't see much difference when compared to someone that flys an airplane with a known defect that should render it not airworthy.

Comment NO: 162	User Name: barnesrc

The owner is ultimately responsible for their aircraft and should be held to maintain the aircraft and or modify it if the manufacturer is not remeding the problem. The aircraft manufacturer should be the first line of remedy and if they are not in business anymore, then it should fall on the aircraft owner. Public safety should be the number one priority!

Comment NO: 178	User Name: Ultraliteteacher

If a certificated aircraft is truly not airworthy, it should not be in the air. The FAA is whom we have tasked with the verification responsibility. On any minor condition, prior to grounding, allow the owner an appropriate time to comply with the airworthiness directive.

Comment NO: 202	User Name: sthomason

This would function much like the current AD system, but the owners would become responsible once the company goes out of business. This would also influence owners to wisely choose the manufacturer of thier aircraft!

Comment NO: 216	User Name: capella1

It is ultimately the responsibility of the owner to comply with airworthiness directives. Where no manufacturer is available to supply directives, the FAA/NTSB should analyze any problems and issue the directives. Certificates should not be revoked just because a manufacturer is no longer available.

Comment NO: 220	User Name: Batson

Yes - This will assure public safety and will put pressure on the manufactures to address any safety of flight issues. If they failed to remedy the problem, sales would be adversely affected. Information on manufacturers is quickly spread throughout the general aviation community and an aircraft with inherent safety issues would be targeted quickly.

Comment NO: 235	User Name: nleggett

I would not want the owner to get stuck with a lemon. The pilot should be allowed to have modifications made to his sport aircraft so that it could retain its airworthiness certification. Nickolaus E. Leggett, Private Pilot

Comment NO: 256	User Name: E002SA

While I believe aircraft owners should be ultimately responsible for the airworthiness of their aircraft, I believe more flexibility is called for than certificate/no certificate. It seems more appropriate in some cases to limit the rights of an aircraft that is not fully compliant rather than to ground it altogether. Limit it from night flying, congested areas and controlled airspaces (as deemed appropriate by a DAR) until appropriate repairs/upgrades are made, but do not ground it. Many ultralights (including trainers) are flown only from grass strips in rural areas, and never go more than a few miles from their point of origin. It would be unfortunate if those aircraft were grounded for a safety requirement needed mainly for operation under conditions the aircraft will never see.

Comment NO: 277	User Name: Barac

I agree that an individual owner should be held responsible. However, I believe that individual owner should be permitted to make or have made appropriate repairs or adjustments for the safety-of-flight issues, independant of the manufacturer, to preserve the certification. Just because the manufacturer defaults on their responsibilities doesn't mean a responsible owner would.

Comment NO: 302	User Name: deeph2o

We do not even trust people to keep their cars road worthy, i.e. the state inspection stickers.

Comment NO: 362	User Name: bobkat

Like it or not, the FAA (or some kind of DAR) will have to have the final responsibility over design, materials, maintenance, etc., but only as a last resort.

Comment NO: 365	User Name: jwalters

COME ON GUYS???? JUST PUT OUT AN A.D. AND GROUND THE PLANE UNTIL THE A.D. HAS BEEN ACCOMPLISHED, DO NOT UNDER ANY CIRCUMSTANCES HOLD THE OWNER RESPONSIBLE FOR WHAT A MANUFACTURER HAS FAILED TO DO.... WE MAY AS WELL ALL LIVE IN CHINA UNDER DICTATORSHIP IF THIS HAPPENS

Comment NO: 410	User Name: wjwil

No Comment

Comment NO: 437	User Name: slacker258

I agree that if the manufacturer goes out of business and a defect is found to exist it is the FAA would have to take action to protect the public safety. I feel this is an assumed risk that an individual accepts when he purchaces a kit airplane.

Comment NO: 443	User Name: hawkul

The manufacturer (or successor) should be responsible for costs involved in any design flaws discovered at a later date. The repairs or modifications should be performed locally to minimize inconvience to the owner and paid by the manufacturer. The owner should be responsible only after the above. Minor problems should NOT ground the plane like they do with a lot of ADs issued now. Structual issues should ground the plane.

Comment NO: 498	User Name: kepfordj

You are responsible for what you fly.

Comment NO: 504	User Name: Steve

The FAA should just like with all other a/c issue some sort of AD note. The owner operator still is responsible for keeping an a/c airworthy.

Comment NO: 505	User Name: William G. macIntyre

Pilots are NOW responsible for the airwothiness of their aircraft. This situation should also hold for the Sport Pilot.

Comment NO: 516	User Name: Taylorcraft078

This is no different than the current situation. Look at the Champ spar AD as an example.

Comment NO: 551	User Name: 584241

In this case I would restrict the airworthiness certificate to "piolt only/no passengers" rather than pulling the certificate. This could be done by NOTAM, rather than notifying each individual and requesting surrender of the certificate. Once the owner complied with whatever the acceptable fix is, he could make a logbook entry so stating the fact. This sounds like a rather remote problem anyway.

Comment NO: 591	User Name: aeromac

Yes, the pilot is ultamatly resposible for the safety of the aircraft.

Comment NO: 597	User Name: goluscombe

As long as this proposal is equivalent to maintenance requirements of the owner or operator for standard aircraft, I do not see a problem. I do wonder what happens to those who may, for example, lease back aircraft to others. It would difficult in my mind to expect an owner to be directly responsible for operators' failure to properly maintain an aircraft. On the other hand, if this proposal intends the operators of the aircraft to be the owners, too, then this would a clever way from preventing a lease back or other "silent" operators from engaging in sport aircraft activities.

Comment NO: 619	User Name: cec1155

I agree. If there is no other remedy than an enforcement action. Hopefully this won't be needed. PIC is ultimately responsible for safety of flight.

Comment NO: 664	User Name: glaunt

for recurring flight safety issues...yes. I think that if these flight safety issues are real..and not imagined. Possibly temporary suspensions..and then further evaluation.

Comment NO: 680	User Name: stewart

I disagree. The manufacturer of the aircraft should be held responsible for design and/ or manufacture problems. The remedy should be accomplished through the issuance of an AD.

Comment NO: 685	User Name: Triplek45

If the safety-of-flight issue is a result of the owners modification, then the owner should be held responsible,if not then the manufacturer should be held responsible. Otherwise the manufacturer would have no incentive to comply with the concensus standards.

Comment NO: 697	User Name: mccoy3

Someone has to be resposible. If no one else the owner must bear it.

Comment NO: 714	User Name: Steve

That is the way it has always been. Owner operater is ultimatly responsable for the airworthyness of the plane they fly.

Comment NO: 743	User Name: towpilot

I agree. Who else could possibly be held accountable for the airworthiness of his aircraft than the owner? Enforcement will likely be a problem, however. A "spot check" system could be implemented to determine compliance with a safety-of-flight issue. Identified safety-of-flight issues could be sent by the manufacturer to all known owners of the affected aircraft with return mail cards bearing signatures indicating compliance, date, who did the work, etc.in addition to aircraft log entries. The person checking compliance would have to have some record of what issues needed to be complied with for a given aircraft. Compiling such a record might also be a problem. Whatever system is implemented, it would have to be one that offers traceable notification of required compliance to each individual owner so that the owner is not "sandbagged" with a compliance requirement that he had no knowledge of. Sounds like there could be an "AD" program in the offing for light sport. How deeply does FAA want to get involved in that?

Comment NO: 835	User Name: gkrug

Agree 100% However, I do believe that manufacturers will be responsible in this area. I do recall the poor experience with the first hang gliders and would not like to see this repeated. Product liability and loss of profits and business are the strongest motivators. A dedicated sport aircraft difficulty web site would be of great assistance.

Comment NO: 860	User Name: David Hodgson

If there is a question of safety with an aircraft the owner should be allowed to get an airworthyness certificate from an examiner.

Comment NO: 864	User Name: johnckircher

The individual is the only one who is responsible for protecting his own life when flying.

Comment NO: 906	User Name: tbrandt

Yes. There are parallel elements that exist now in terms of aircraft airworthiness and pilot operations of un-airworthy aircraft.

Comment NO: 940	User Name: Flyguy

The pilot owner is ultimately responsible anyway, right?

Comment NO: 947	User Name: whiteman

Its somebodys responsibility and the owner is the obvious target, the one with most to lose. But, I tend to wonder if the FAA has the resource to enforce this.

Comment NO: 966	User Name: Spdrflyr

as it should be.

Comment NO: 969	User Name: dfreeman

I agree. I belive you have to differentiate between major “airframe failure” or “loss of control” issues versus minor potential problems and cannot just throw every little thing into an “AD” category without getting into an over regulated, unviable situation. Getting the word out about cause and effect in the form of accident reports usually will make the average person think twice about risking his or her life, so timely communication of the facts is important. If there is sufficient evidence to support an airworthiness issue and there is no manufacturer or successor to help remedy it, then the individual aircraft owner should take the necessary steps to assure safe operation of the aircraft. Perhaps something as simple as making it illegal to carry a passenger in the case of non-compliance with non-supportive manufacturer safety issues that are not of a critcal nature would suffice. If the make and model of aircraft is popular then there should be some resolution as to a proper remedy. Perhaps an organization such as EAA would be instrumental in helping to coordinate a remedy. The current “AD” system is too politically driven and restrictive and the approved remedies too costly in most cases. If the LS airworthiness becomes that restrictive, then very few individuals will be able to afford to participate.

Comment NO: 988	User Name: kcmalls

As long as you have a method of keeping an aircraft owner notified of safety of flight issues the owner should be accountable for keeping the aircraft airworthy. There would have to be a classification system (ie. immediate, next annual, etc.) Don't want to get too nit picking over every little change. Only things that affect safe flight.

Comment NO: 992	User Name: Ro

I question if the FAA has the manpower to enforce this. I do belive that the owner should be responsible for the airworthiness of his aircraft, but I belive a system of notification in a timely manner should be in place first.

Comment NO: 1042	User Name: RFI

I agree in principle but the FAA can get carried away and generate more problems than cures. I think the bottom line is that the aircraft owner is responsible for the airwothiness of his/her aircraft regardless of what the manufacturer does. Bad manufacturers will be weeded out very quickly if they produce an unsafe aircraft. If There is something that seriously affects safety and the manufacturer doesn't take action or is out of business, then the FAA should issue an "AD" type of notice and enforce it.

Comment NO: 1059	User Name: terryo

It should be the owners responsibility.

Comment NO: 1101	User Name: bruce2

A flawed design or manufacturing defect should be the man. responsability just like an automotive recall "their time their dime" age and miss use should be the owner/builder responsability You change the assembley or drill holes that weaken structures its your butt baby

Comment NO: 1109	User Name: Flymo

Difficult call, but on balance the owner should be responsible. It's not unlike cars - were a person to fail to maintain their car they can be fined - and if this were to cause an accident then the victim can sue. That is fair. Where fairness fails is in faulty design, which an owner may not be competent (or required to be competent) to pass judgement. To take an example from history, the early 'Flying Flea' owners were unaware of the stability defects and could not be held liable, but one could argue that the designer _should_ have been aware.

Comment NO: 1117	User Name: fatplane

Are you going to do this for each of the 250+ fat ultralight models? How? Can't you be creative and come up with some new way that won't require you to add a new department of 100,000 federal employees? I can't think of a way.

Comment NO: 1148	User Name: 21214

If an aircraft is being built and sold under the light aircraft catagory, than the manufacturer should have some burdon of responsibility for the airworthiness of the aircraft that they produce. If the manufacturer of the aircraft is also the person flying it (like under the bulk of the current experimental catagory) then the individual would be responsible.

Comment NO: 1156	User Name: rotopup

Poor designs will be "filtered" out by the public. The buyer/flyer should have ultimate responsibility.

Comment NO: 1163	User Name: Gyroman

Initially it would be accecptable to pull the airworthness certificate -- but the owner of a specific should have the opportunity to make the necessary repairs or changes to bring it back to an airworthy condition

Comment NO: 1191	User Name: heronium

I think that the ultra lite aircraft assc. like Aero sports connection can and should police industery

Comment NO: 1197	User Name: jonvee

If a company goes out of business there should be a path for an aircraft owner to correct the problem and get his certification back.

Comment NO: 1199	User Name: Russ King

For kit aircraft the individual needs to be responsible. The kit manufacturor can't be responsible for what others build. The liability issues would preclude manufacturors from offering kits otherwise.

Comment NO: 1234	User Name: gyrobee

With respect to OPERATIONS, the aircraft owner obviously has primary responsibility with respect to airworthiness. HOWEVER, if the alleged safety problem arises as a result of the manufacturer (who would hold the certificate that could be revoked), any enforcement action should be directed at the manufacturer.

Comment NO: 1236	User Name: PWPlack

I believe this must be an option for FAA.

Comment NO: 1240	User Name: helitim

With aircraft ownership comes the ultimate responsibility of airworthiness. I am currently held liable through AD's and non-compliance can result in the loss of my aircraft's airworthiness cerftificate. The standard should be applicable to any ready to fly aircraft.

Comment NO: 1300	User Name: John Ross

We have an agressive plaintiff's bar. They will act as advocates for the injured. If the design is faulty, the manufacturer loses the suit. Concerning operations, the aircraft owner obviously has primary responsibility with respect to airworthiness. If the problem arises as a result of the manufacturer (who would hold the certificate that could be revoked), any enforcement action should be directed at the manufacturer.

Comment NO: 1336	User Name: RTHOMPSON

I agree, This is the way it is now, basicly the pilot in comand of a certified plane today is responsible for the aircraft he flies. let the industry work this one out.

Comment NO: 1389	User Name: wolfsdens

No Comment

Comment NO: 1429	User Name: sam

I agree that the owner has the ultimate responsibility for his/her aircraft. I also believe that if this proposal is to work as intended and not become another burdensome, costly government-run program, the industry itself will have to raise the bar and ensure that it is producing viable, quality products for the consumer. If a manufacturer is found to be using questionable materials or building methods, then the industry needs to red-flag that manufacturer immediately and try to convince them to change. If nothing is done and someone is injured or killed and then the lawyers get involved, watch out.

Comment NO: 1480	User Name: sleepy

I think it would be the owners responsibility. However, if there is a design or manufacturing flaw, that should bring some responsibibity to the manufacturer, especially if it is certified

Comment NO: 1546	User Name: Bill Bardin

Yes. It is in the public interest. However, the aircraft owner should be assured of a fair opportunity to learn of and fix any problem with his/her aircraft.

Comment NO: 1557	User Name: llhoedl

No Comment

Comment NO: 1574	User Name: ultraj51

In a sence isn't this the case now...an annul inspection requires owners to make mandatory corrections ie oil pump on lycoming engins

Comment NO: 1586	User Name: Catalina36

Use regular AD system for ready to fly or kit aircraft. this system is known and effective.

Comment NO: 1608	User Name: davidbauch

No, this should be responsibility of the manufacturer or their successor, not the individual owner.

Comment NO: 1639	User Name: live2av8

NO, because as history has proven time and again, current day ultralighters don't even need an airworthiness certificate to operate safely. This is something you keep ignoring. Embracing the idea of enhanced training (by the industry-for the industry) which thoroughly stresses to pilots the need to do a PROPER preflight before EVERY flight, to voluntarily attend all safety seminars in their area, and to help each other with maintenance concerns, will go much farther towards overall safety to the public than any fancy smancy airworthiness paperwork. As an FAA pvt. pilot, ultralight instructor, and airpark operator I've never seen the need for airworthiness paperwork for ultralight class flying machines, what impresses me is when the machine is actually airworthy. The over-rated paperwork doesn't do that, it only implies a given machine MIGHT be airworthy the moment it's written. Turn the machine over to a poorly trained pilot, or someone who doesn't perform proper preflight inspections, or a pilot who doesn't make sure proper maintenance has been performed, and you might as well utilize the fancy smancy paperwork as toilet tissue. -live2av8-

Comment NO: 1652	User Name: JSTO1

The manufacture should be the source of the remedy. The FAA should provide notification to aircraft owners in a timely manner. Feedback to FAA is not necessary or effective.

Comment NO: 1663	User Name: TOMS

The mfg shoud sen out SB's and if needed the FAA sen out AD's

Comment NO: 1685	User Name: john brady

No Comment

Comment NO: 1690	User Name: bliddel

In our country there is a historical basis for the fundamental legal rights of ownership. Granted, government agencies have been hacking away at those rights for generations, but that does not justify these actions. An individual owner is no match for the mighty FAA. The FAA on the other hand, has an dismal record of requiring absurd Airworthyness Directives (ADs) without proper evaluation of alternatives or statistical analysis of the cost-benefit of such ADs. To expect an individual owner in essence to re-engineer and recertify his particular individual aircraft just because it is orphaned or because the current manufacturer is "gone fishing", is not at all reasonable. In the absence of a cooperative manufacturer (highly unlikely anyway), the FAA should offer a means to restore airworthiness. If the FAA is smart enough to figure out that something needs fixing, they should be smart enough to propose a solution. Anything less constitutes a violation of the fourth amendment of the US constitution (against unreasonable seizure). Analogously imagine requiring Ford Model T antique owner/operators to re-engineer their own airbags and 5mph bumpers before continuing to drive!

Comment NO: 1726	**User Name: mav**

THe PIC is the final arbiter of flight safety regardless of the initial airworthiness of a design. Any aircraft can be rendered unsafe to fly without knowledge of the FAA, it is the knowledge of the individual that determines public safety. If a manufactured design has an inherent fault it will be grounded by the PIC until he has assured repairs, as long as the channels of comunication remain open and owners participate in spreading the word re a design fault.

Comment NO: 1769	**User Name: edburkhead**

Cautious agreement. Though the individual owner must have responsibility for the aircraft in this instance, the remedy must follow the form of Service Bulletins or Airworthiness Directives that provide a means of bringing the aircraft into compliance.The rules MUST allow for diverse means of bringing the aircraft into compliance. For example, where 32 standard inspection holes were mandated before, it would have been fully possible to provide a BETTER inspection using specialized, flexible video tools and tiny holes. This alternate means was not allowed for current certificated aircraft. This is an example where a more dynamic segment of aviation can support and develop IMPROVEMENTS in the state of the art.

Comment NO: 1794	**User Name: steve.stefanic**

I agree that an unfit aircraft should not fly and that the owner is the last resort, but is the FAA also going to cooperate with that owner or group of owners if they find a suitable repair shop for the aircraft to make it airworthy again? I hope the FAA doesn't intend to pull the certificate forever if the owner finds a suitable repair shop? In some cases, the owner may be able to correct the problem. Is the FAA open to this?

Comment NO: 1838	**User Name: megamouse**

Not sure how this is different from existing certified or experimental aircraft. What is the practicalities of an individual or owners organization being able to obatin approval for suitable fixes. What is the standard by which a fix will be evaluated. Would aircraft, be able to recertified as experimental, and justify a fix through so many hours of flight? I would like to see fixes be able to be approved through a field change in these cases. Manufactures and FAA should have responsibility for notification of owner where there are design issues affecting airworthiness.

Question Number 12 - While the FAA made an assessment of the potential cost of compliance of the proposed rule, the FAA requests comments on the validity of its assumptions. These can be found in two sections of the proposed rule: Section VII – Paperwork Reduction Act; and Section IX – Regulatory Evaluation Summary. Do you believe the FAA made accurate estimates of the number of existing and new sport pilots impacted, the number of sport pilots who would become a Repairman with a maintenance rating for commercial purposes, the number of delivered new light-sport aircraft (by category, such as fixed-wing, powered parachutes, trikes, etc.), and the number of flight instructors with a sport pilot rating, over the next 10 years? Please provide data in support of your comments.

(12) While the FAA made an assessment of the potential cost of compliance of the proposed rule, the FAA requests comments on the validity of its assumptions. These can be found in two sections of the proposed rule: Section VII – Paperwork Reduction Act; and Section IX – Regulatory Evaluation Summary. Do you believe the FAA made accurate estimates of the number of existing and new sport pilots impacted, the number of sport pilots who would become a Repairman with a maintenance rating for commercial purposes, the number of delivered new light-sport aircraft (by category, such as fixed-wing, powered parachutes, trikes, etc.), and the number of flight instructors with a sport pilot rating, over the next 10 years? Please provide data in support of your comments.

Visited: 149	Total Comments: 65	Last Post: 5/6/02

Comment NO: 38 **User Name: delta2ul**

No Comment

Comment NO: 73 **User Name: flyfree**

All but the instructors. With 1400 so-called instuctors out there and only about 3-400 actively instructing in various degrees, it's unlikely they will do much "hoop jumping" in order to get a Sport instructors lic so THEY CAN DO THE SAME THING. Many will just stop instructing at all.

Comment NO: 88 **User Name: Bradley**

No Comment

Comment NO: 105 **User Name: artspain**

I agree. If anything I think the FAA was conservative in the estimates.

Comment NO: 114 **User Name: Bill Cartwright**

I believe it will be 1/2 or less than what you expect and in the future it may become even less due to the many requirements that will be put in place. You can't make a silk purse out of a sowels ear nor a 55Knt.FAT UL into a 115K SP.

Comment NO: 128 **User Name: w1bfn**

No Comment

Comment NO: 146 **User Name: daberti**

No Comment

Comment NO: 163 **User Name: barnesrc**

No Comment

Comment NO: 179	User Name: Ultraliteteacher

I think the FAA has underestimated the cost of insurance and the legal systems impacts based on this rule becomming law. There will be a push backwards and away from this regulation if it is left as stringent and complicated as it is. Loosen up and simplify these reg's or suffer the fate of the Recreational Pilot certificate. Rec Pilot, a perfect solution to a problem that didn't exist. SP is currently in the same boat. The GA folks that lose their medical gain with SP. I don't see any other group advancing. Cost goes up, worth stays the same, therefore value goes down. Nobody wants less value, especially when avoidable.

Comment NO: 219	User Name: capella1

The ability to provide training directly in the LSA of choice will improve demand and spawn the required instructors and mechanics. Ability to train in the LSA and other issues proposed will spark renewed interest and many new students. The only data we have are the many calls from potential participants.

Comment NO: 222	User Name: Batson

I am a flight instructor and have been since 1968. I believe finances are the greatest detriment to new students obtaining a license. The sport pilot license would help greatly and as such I believe the number of new pilots is underestimeted. I do not believe a great number would obtain repairman certificates. Most new aircraft would be A&P maintained. New aircraft sales will be tremendous especially if the price can be held under $50,000. Also, flight instructors will increase as can be seen from te numebr of ultralight instructors operating once the exemtion was granted. Overall, I believe the positive finacial aspects of the proposal have been underestimated.

Comment NO: 259	User Name: E002SA

The figure of "the value of a fatality avoided is $2.7 million" is far too high, $500,000 seems more likely. Also is the math about 82 of 83 potential fatalities will be prevented in 10 years seems wrong. Pilot error will continue to be the primary cause of accidents as it is in the GA community.

Comment NO: 269	User Name: dalemseitzer

I think the number of ultralights is over estimated. I also believe the number of non exemt 2 seat ultralight traers is over estimated. I believe the number of BFI's that would go on to be sport pilot instructors is over estimated. In MN, IA and WI there are 3 active Advanced Flight Instructors (none in MN). and I believe the number of ultralight (heavy single seat) pilots who will go to sport pilot is over estimated. I think the number of GA and former GA pilots who will go to sport pilot may be under estimated--the current proposal is more attractive to them than to ultralight pilots. I think the costs to become a pilot are under estimated because of the restricted use of the trainers, extra cost of the planes. I think the cost to be an instructor is right for GA CFI's but under estimated for BFI's to becone SP CFI's. I think the maintenance and associated training is underestimated.

Comment NO: 279	User Name: PAI

No Comment

Comment NO: 333	User Name: Joe G

I believe FAA numbers are grossly inflated.

Comment NO: 364	User Name: bobkat

The numbers are probably a bit inflated, but there are a lot of people out there who want to learn to fly in basic, low and slow, machines, but costs are the biggest deterrent. Time will tell

Comment NO: 368	User Name: jwalters

ONLY IF IT REMAINS AFFORDABLE!!!!!!!!! REMEMBER, WE ARE TALKING ABOUT PEOPLE WHO MAKE LESS THAN 35K A YEAR. JUST MAKE IT AFFORDABLE AND ALL WILL REAP THE BENIFITS!!

Comment NO: 411	User Name: wjwil

No Comment

Comment NO: 446	User Name: hawkul

I simply can not believe your numbers. Compare the cost to become a private pilot to the cost to become a rec pilot and LSA pilot. Not that much difference. Then compare those figures to the cost to become an ultralight pilot. Then look at how easy it is to become an ultralight pilot. You deal with one person and no complications. Compare cost to the owner for maintaince by an A&P with certified parts and the paperwork involved agianst generic parts installed by the owner with no paper work involved for ultralights. 16 hour classes for inspections? On these simple planes? 80 hour classes to do minor maintaince? Why not require this for private pilots to do prevenative maintaince since it makes just as much sense?

Comment NO: 507	User Name: William G. macIntyre

No data is available for an informed response.

Comment NO: 508	User Name: Steve

I belive the numbers of new sport pilot to be close to faa est.I do not think the # of pilots seeking repairman certif will be as high

Comment NO: 552	User Name: 584241

If justifying this entire proposal hinges on the accuracy of your estimates, then we are back to square one.

Comment NO: 579	User Name: DartHere

As General Aviation Pilots become older and unable to pass the MED, Then you will see an increase in the number of Sport pilots. In the Ultralight Community you will see a decrease in Pilots only because the number of Instructors will go DOWN, the COST to fly will go UP. You can't make ONE SIZE FITS ALL in aviation It shouldn't be done. As for the numbers that the FAA has come up with, I sure won't be letting them do my income tax this year.

Comment NO: 598	User Name: goluscombe

You have it over me. I have no substantitive date to speak this issue and defer to the FAA on this matter.

Comment NO: 620	User Name: cec1155

I think the FAA has access to enough data to make educated astimates.

Comment NO: 666	User Name: glaunt

It is anyone's guess!...how far off were the "experts" in estimating Recreational pilot..and how accurate were the estimates for primary aircraft type certifiation? This might go the opposite way..better than expected..who knows.

Comment NO: 683	User Name: stewart

I have no data in order to substantiate your findings. However, common sense would dictate that reductions in government RED tape and "make busy" burecratic jobs would encourage more aircraft design and manufacture, as well as lowering costs. Also, I have no way of estimating the number of pilots that have lost their medicals that will resume flying, but I think the numbers would be in the thousands. As for flight instructors, if the FAA will not place a ton of conditions on prospective instructors,I feel there will be ample instructors available.

Comment NO: 689	User Name: Triplek45

I think the cost to comply is vastly understated, and the number of participants is vastly overstated. I think 80% will come from GA lost medical pilots, 15% from UL instructors and fat UL's that are forced to participate and 5% from NEW RICH students coming into aviation.

Comment NO: 698	User Name: mccoy3

I don't think anyone can forecast these numbers. The public may or may not embrace light-sport flying. Many unforeseen factor will influence the out come.

Comment NO: 730	User Name: FlyDiver

If a powered weight shift trike, currentl priced at $15K, is priced at $35-40K as a SLSA as current USA manufacturers are suggesting, SP will be dead on arrival. The majority of the legal liability appears to be transfered to the manufacturers by the NPRM and based on data from GA manufacturers, at least 40% of the cost of an SLSA will be insurance. The rather large UL industry growth in recent years is directly attributable to the low cost of aquiring an aircraft. I am not an economist but when prices go up, demand goes down. Double the price and halve the demand? We shall see.

Comment NO: 836	User Name: gkrug

Only time will tell. From experience... all guesstimates are innacurate... some more than others. I do believe there will be a major surge in sport aircraft purchases including the repairman certificates. I will purchase a sport aircraft and go thru any repairman training that's offerred even though I may only work on my craft. Cost of aircraft will be a factor in new purchases.

Comment NO: 858	User Name: johnckircher

I believe that the FAA estimates for the costs of complying with Federal regulations to be off by at least 100% to 200% and cite generally available and published info on federal cost overruns from ALL compliance regulation enforced by the Federal government in areas such as health care, transportation, communications, civil rights, armed forces budgets, environmental regulations, etc. Furthermore, I site the FAA's record on airport security, and the incredible cost increases incurred in the latest changes as one Federal Agency now makes us "safer" than the other. The Paper Work Reduction Act alone kills more trees than it was ever intended to save, simply because, for so long, it never anticipated or used the very digital format that is finally being used here. FEDERAL REGULATIONS DRIVE UP COSTS MORE THAN CAN BE ANTICIPATED! Before a regulatory agency is allowed to mandate expendatures in the private sector, it should be required to indemnify anyone it affects for ANY unanticipated costs beyond those used in the justification of its actions!

Comment NO: 948	User Name: whiteman

I favor anything that reduces red tape. The FAA'S crystal ball is just as good as anyone elses. It would seem to me that if this sport takes off like most hope it will, the FAA may face a tidalwave of paper that can't be handled in a timely manner.

Comment NO: 970	User Name: dfreeman

I agree. They are as accurate as anyone can guess. One of the factors that will make them way overstated is to make the final rule restrictive to the point where no one can afford to get involved. That will certainly keep the actual numbers much lower than anyone is projecting at this stage.

Comment NO: 990	User Name: kcmalls

Costs and financial impact are hard to estimate. It is my opinion that this rule will bring back thousands of pilots who stopped flying because of cost and who didn't want to go the ultralight route. This will also make it cost effective for non pilots to get into the sport and then move up to GA and heavier more complex aircraft. In summary more people will stay in and more will get in. Its a good deal and the best thing to come down the pike in a long time.

Comment NO: 1043	User Name: RFI

If the FAA doesn't know for sure then who am I to make an opinion? It is hard to guess how many new pilots and aircraft will be generated in the next ten years. A lot depends on the economy and other factors that we can not fircast.

Comment NO: 1060	User Name: terryo

No Comment

Comment NO: 1118	User Name: fatplane

I can't vouch for the FAA's accuracy or anyone elses on this one.

Comment NO: 1151	User Name: 21214

10 years is hard to predict. A lot depends on the economy and other factors. Most of the economic impact will be insurance and liability concerns of the light sport aircraft manufacturer. This will likely cause the current cost of a $20,000 experimental aircraft to leap to over $40,000. If it is the intension of the FAA to drive the final nail in the general aviation coffin, than I think light sport is the way to go!

Comment NO: 1158	User Name: rotopup

Tough call. It may rebuild aviation or it may make it more expensive and therefore cause a decline. If the current "amateur-built" Experiimental category and part 103 are left alone, I think things will improve with the new ruling.

Comment NO: 1164	User Name: Gyroman

In view of contrary evidence it seems the FAA has made a reasonable estimate of the situation

Comment NO: 1196	User Name: heronium

i think the cost will be much higher just like every other thing the goverment does (take medacare ,it was to cost 9billion but its more like 290 billion) this will put the cost way above too many people

Comment NO: 1198	User Name: jonvee

No Comment

Comment NO: 1239	User Name: PWPlack

I do not believe this data can be reliably projected by FAA, nor anyone else. This NPRM has the potential to bring many currently-idle former pilots back into activity.

Comment NO: 1242	User Name: helitim

The comments posted by johnckirher on April 11,2002 echo my sentiments quite well. Any govrnement agencies ability to accurately predict costs have been historically poor. If I ran my business that way, I would be out of business since I can't raise taxes to cover the mistakes.

Comment NO: 1276	User Name: James48843

The regulatory analysis states you expect 9,000 pilots will seek a piot certificate. It should be assumed that based on the 3-1 ratio of fixed wing certificated aircraft to fixed-wing current pilots (200,000 aircraft vs. 600,000 pilots) that at least 3,000 aircraft will need to be certificated in the fist three years of the program. However, your DAR analysis states only 100 MFG DAR and 200 Flt Std's DAR's average yearly frequency of impact by this rule. Either the DAR's will be doing 10 times what you expect, or there will be only 1/10th the number of aircraft brought into complaince with this rule. The estimate of $1,427,500 as the cost of public compliance of part 21 works out to $ 5,000 per aircraft. Your figures say DAR's will account for 300 part 183 determinations a year. We presume this means you estimate 300 DAR's a year will apply and be evaluated for appintment as DAR's. Under current procedures of 8100.8A, it takes an estimates 40 man-hours to appoint a DAR, and an addtional 8 hours per year to supervise. Fourty-man hours times 300 DAR's plus 8 hours supervision would mean 12,000 man hours initially, and 2400 hours per year to maintain those DAR's. We believe that once 300 DAR's are in place, the number of DAR's will drop over time to at most 150 per year for on-going certificaiton needs. The initial cost then is 12,000 government man-hours the first year, and then 1,200 hours a year. At $75/hour total cost, this is an initial cost of up to $900,000, rather than the stated cost of $26,195, and an annual cost of $90,000, if half the number of DAR's is in place.

Comment NO: 1337	User Name: RTHOMPSON

I think thease assumptions are a good a guess as can be made. Just don't make the existing part 103 and experimental certified any more costly or complicated. I think the avaition industry and pilot population can grow positive with this.

Comment NO: 1363	User Name: knight starr

No Comment

Comment NO: 1390	User Name: wolfsdens

No Comment

Comment NO: 1415	User Name: humair14

This assesment is probably is as good as can be expected. Two things I am sure of it will return numerous pilots now idle to active flying and will bring in several thousand new pilots into general aviation that would not come on board under current rules.

Comment NO: 1430	User Name: RichJennings

This question would be hard for anyone to address. Without knowing what the final product will be, I can't see how anyone could make a guess as to how many Sport Pilots will be created or the number and kinds of new Sport Aircraft will be on the market. Just as in 1982 when Part103 came on-line, no one knew what would be in store for the future. ULS went through a rough "infancy" period of 8 to 10 years before the market finally settled down to it's current state. And so now, we've evolved to the point that a relatively small percentage of the "Ultralights" can truely meet Part 103 specs. Yet they are marketed and sold as "Ultralights".

Comment NO: 1483	User Name: sleepy

I think in regards to powered parachute the numbers will drop sharply. I know in some cases just the possibility of this new rule has stopped some from getting in the sport caused some to get out of selling and training.

Comment NO: 1551	User Name: Bill Bardin

Based on the FAA's use of faulty statistics, incorrect conclusions of data, and conferring with non-ultralight representative groups (EAA and General Aviation Coalition), and overlooking the USUA's official stance, it does not seem reasonable to think that any other FAA data in this NPRM can be correct.

Comment NO: 1560	User Name: llhoedl

No Comment

Comment NO: 1575	User Name: ultraj51

No offence but just about no govt agency can estimate any cost figure for anything. Now when it comes to estimating number of deaths/accidents you do good work.

Comment NO: 1576	User Name: ultraj51

No offence but just about no govt agency can estimate any cost figure for anything. Now when it comes to estimating number of deaths/accidents you do good work.

Comment NO: 1609	User Name: davidbauch

I suspect the FAA's estimates are quite low.

Comment NO: 1642	User Name: live2av8

NO, proper data can’t be obtained because Sport Pilot hasn’t happened yet. In questioning 14 other exemption holders in my area, none are interested in becoming Sport Pilot Instructors, 2 are contemplating becoming 2-place Sport Pilots, the others feel it’ll be safer if things were to remain status quo, than when Sport Pilot is implemented. This seems to be echoed by most people on numerous aviation mailing lists I subscribe to. Many have stated there’s no way they’ll become Sport Pilots and enter the whole needless regulatory environment, simply to fly a single place 320 lb machine at 70 mph. Something that Sport Pilot doesn’t even address properly. -live2av8-

Comment NO: 1656	User Name: JSTO1

I think the numbers are reasonable and the benefits are underestimated. If enacted the Sport Plane will significantly increase the number of people who will participate in flying. It offers significant potential savings to people who now think aircraft ownership and operation is to expensive. Likewise is more reasonable medical constrains will get more pilots to participate that are now sidelined by non-critical things like alergies.

Comment NO: 1664	User Name: TOMS

No Comment

Comment NO: 1713	User Name: Pam

The exstimated numbers of existing PPC pilots that will actually become repairmen with maintenance rating for commercial purposes is a VAST OVER ESTIMATE. The number of UFI/AFI/BFI pilots that will actually become SPORT PILOT FLIGHT INSTRUCTORS is so low that it will cause MORE safety problems not less!

Comment NO: 1735	User Name: Spdrflyr

A legal Trainer that I can instruct in under Sprot will run upwards to $60K...You do not have a clue. Your estimated costs are skewed and unrealistic. If I can't continue to train in the trainer I worked my ass off to buy, I'm not goinna play. Fat, not fat, exemption or no exemption. You don't know what the ULtralight culture is. We ain't the $50 hamburger croud. Get it?

Comment NO: 1795	User Name: steve.stefanic

I can't confirm or deny the exact estimates of the FAA, but I think there will be an increase in the number of people wanting to fly again, like myself who has been away from it for most of the last 35 years due to the prohibitive costs.

Comment NO: 1814	User Name: frjn33

No. Many of the instructors with which I have talked have said that the prospects are out of the question because they would have to buy a new, more expensive aircraft in order to do something that they love, but can either barely make a living at, or only be able to do now. You've designed a good program for the rich and the tawny, but not for those of us who were attracted to ultralighting for its low cost and simplicity. Fr. John Elledge Havre de Grace, MD

Comment NO: 1839	User Name: megamouse

Personal experience with FAA cost of compliance estimates is that the estimates did not correlate well with actual costs. No feel for what the real cost is.

Question Number 13 - Is the FAA's assumption of the average price of light-sport aircraft potentially impacted by the proposed rule accurate?

(13) Is the FAA's assumption of the average price of light-sport aircraft potentially impacted by the proposed rule accurate?

Visited: 250	Total Comments: 78	Last Post: 5/6/02

Comment NO: 39 **User Name: delta2ul**

No Comment

Comment NO: 48 **User Name: capella1**

Until such time as specific airworthiness and production certification procedures are known, it will be difficult to predict the price for such an aircraft.

Comment NO: 74 **User Name: flyfree**

No. It will impact ULs priced all the way down to $10,000 or less the most.

Comment NO: 89 **User Name: Bradley**

No Comment

Comment NO: 106 **User Name: artspain**

I think it's as good a guess with as possible.

Comment NO: 113 **User Name: Bill Cartwright**

Presently I can buy any aircraft except Rans in the 20K range. Several Manufactures are quoting mid 55K to 65K range. There is too much disparity and Sport Pilot will Fail on these grounds just like the GA arena is doing now!

Comment NO: 129 **User Name: w1bfn**

No Comment

Comment NO: 130 **User Name: w1bfn**

No Comment

Comment NO: 147 **User Name: daberti**

No Comment

Comment NO: 164 **User Name: barnesrc**

Initially it will probably spike the prices of these aircraft. After about 10 years they will probably even out again.

Comment NO: 180 **User Name: Ultraliteteacher**

There are two proposed aircraft announced already for SP market and they are in the 50,000+ range. This is for aircraft that current street price is 60% of that.

Comment NO: 203 **User Name: sthomason**

Currently we are seeing ready-to-fly planes at the $50,000 level with advanced kits around $30,000. I would expect the final pricing to remain about this level or less. Otherwise they will price themselves out of a market, much like GA has!

Comment NO: 223 **User Name: Batson**

Yes. The average cost will be a fraction of a new Cessna.

Comment NO: 270	User Name: dalemseitzer

I think manufactured planes in the sport ctegory will be much more expensive to buy and maintain. If I were a manufacturer I would charge more to cover the liability insurance and continued foloowup. As a manufacturer of engines / gear boxes, props, I would require extra maintenance--maybe a full overhaul after 200 hours to prevent even one engine out. I would also require that all service be done at my service center so I can watch quality. All that extra attention will cost more money.

Comment NO: 289	User Name: Joe G

These assumptions appear to be inaccurate. Recent reading indicate, at least, one known manufacturer that presently rolls out a ready-to-fly model for well under $40,000 already estimates the same model will be around $60,000 under the proposal.

Comment NO: 366	User Name: bobkat

Pretty close.

Comment NO: 370	User Name: jwalters

THER NEEDS TO BE REGULATION IN THIS FIELD ONLY IF THE MANUFACTURERS GET GREEDY.

Comment NO: 412	User Name: wjwil

No Comment

Comment NO: 425	User Name: DartHere

The figures represented by the FAA are pure fantasy. First, No one knows for sure what the "Consensus Standards" will be, Do we? Second, if they include Type Certified Engines the difference in the Ultralight world will be at least $ 11,000 Third, Presently many Weight-Shift 2 seat Trainers can be purchased for $ 9,000 to $ 11,000. Most of these trainers like most weight-shift aircraft use the Rotax 503 or 582 two-stroke engines. These engines cost between $ 4,500 and $ 5,500 of the $9,000 to $11,000 cost. If the New Special LAC requires a "Type Certificated" engine, then the alternative will be the Rotax 912. This certificated engine cost at least $ 16,000 an over all increase of $ 11,000. This increase represents a doubling of the cost of the aircraft, and remember we are only reviewing the engine cost not the paperwork cost, the quality assurances cost etc. When you take into account the other expected cost increases of the new SLAC then I feel that this is too much of a burden.

Comment NO: 450	User Name: hawkul

Do you mean what it would cost for a fat ultralight to become a sport plane? Way too much. First I have to go thru the process of getting a sport pilot certificate. It souldn't be hard since I have already passed simular tests but why should I have to pass another test to fly the same plane in the same manner as before? Then I have to get a DAR to inspect my plane and issue an airworthiness certificate. More time, money and hassles for nothing since existing planes transfered into sport must fly under rules "simular to part 103".

Comment NO: 510	User Name: William G. macIntyre

As good as anyone's price guess, but beware allowing excessive manufacturers liablity for US companies....this will encourage the importation of well built and easily certified foreign sport planes(to the detriment of the US aircraft industry). I believe that aircraft manufacturers in Eastern Euope, Latin America , and Asia are not particularly concerned with US generated law suits. Ever try to sue for damages incurred by a car accident in Mexico?

Comment NO: 512	User Name: Steve

I belive that some of the prices will go up. However if the market is remain competive things will even out.

Comment NO: 524	User Name: Taylorcraft078

I figure that you will ad 25-50% to the value of my Taylorcraft. I doubt that there will be much change in the price of new, prebuilt aircraft due to insurance considerations. You are not changing anything on the price of kits.

Comment NO: 553	User Name: 584241

No Comment

Comment NO: 558	User Name: dmyhra

I beleive it is accurate.

Comment NO: 599	User Name: goluscombe

Time will tell. The price of airplanes is only one of the items that go into the "cost" of flying.

Comment NO: 623	User Name: cec1155

I hope it's close or lower.

Comment NO: 669	User Name: glaunt

Those figures look to be about right....maybe just a bit conservative.

Comment NO: 670	User Name: capella1

Assuming a manufacturer does a proper job of design engineering and production quality control, then the cost of documenting and complying with a "consensus standard" of airworthiness and quality assurance should not add significantly to the cost of a product. Issues concerning legal defense expenses may be the most significant driving price factor on factory built ready to fly LSA, but this situtation exists already for both UL and certificated aircraft. All costs are directly related to the complexity of the product. Keep it simple.

Comment NO: 687	User Name: stewart

I belive that the market will determine the value of the aircraft. The most important factor concerning the price of an airplane is the engine. The FAA should NOT make it mandatory for certified engines ONLY to be used. Mandatory use of certified engines will kill this segment of aviation as the prices will soon approach GA market prices.

Comment NO: 691	User Name: Triplek45

I disagree; I think it is understated

Comment NO: 700	User Name: mccoy3

It's as good as any at this time

Comment NO: 715	User Name: Steve

While they will not be cheap, they will still be more affordable than any other new a/c. There is no reason a light sport a/c could not be developed and marketed for the price of a new car.

Comment NO: 731	User Name: FlyDiver

Not according the USA trike manufacturer I spoke with. He estimates his prices will more than double.

Comment NO: 737	User Name: Wayne McIntosh

I have read this in the NPRM and it seems to say that a new certified Light Sport plane will cost $4000.00 to $9000.00 more if I understood correctly. As it stands now I think that a complete and ready to fly single seat ultralight costs about $11,000.00 to $15,000.00 and a 2 seat ready to fly ultralight trainer goes for $15,000.00 to $24,000.00. Add the $4000.00 to the single seat and $9000.00 to the 2 seat and we have from $15,000.00 to $33,000.00. So do I think that the FAA estimate of the cost of a Light Sport aircraft is accurate? No, because the cost of the manufacturers liability is not also figured in. The Sport Pilot proposal needs to address this if it can. At Oshkosh last summer there was a European airplane that was touted to be Sport Pilot ready that cost $60,000. That is probably a more realistic figure.

Comment NO: 778	User Name: Rich Wallin

Yes, but do not require certified engines.

Comment NO: 837	User Name: gkrug

To some degree. Some of the present manufacturers will already be in, or nearly in compliance. For sure their paperwork load will be more costly but these costs can be incorporated in the selling price as money well spent. Safety costs money but saves lives. Lost lives cost more money than any regulation. After saying that I do know that government control, by nature, can cost considerable and this should be kept in mind. We are trying to reach new, young pilots. For them the cost will be an issue.

Comment NO: 859	User Name: johnckircher

I think it is very underestimated!

Comment NO: 865	User Name: David Hodgson

This estimate is way to low. After sportpilot is acheived in its current form, a pipercub and a private pilots license will probably be a cheaper way to fly low and slow. I do not feel that the price of sport pilot aircraft will induce many new light sport pilots.

Comment NO: 897	User Name: Spdrflyr

I vehemently disagree with your assesment. And this is one of the big problems. A Special Light Sport Certified Aircraft is gonna cost around $60,000. I called a number of mfgrs and polled them ont eh issue. Ther is NO WAY I'm going to spend $60,000 on a plane to train in. Absolutely NO WAY. I know a lot of instructors who have said the same thing. This is where it's gonna bite you. With no instructors...what are you gonna do then?...sounds like another eREC Pilot in the making...

Comment NO: 943	User Name: Flyguy

No. I think those numbers are way too low. Prices will soar because of the law of supply and demand. I think everything currently priced below $30,000 will experience tremendous upward pricing pressure. At some point the price will come down for the same reasons, but at first it will be Katie bar the door.

Comment NO: 949	User Name: whiteman

The major impact on price, other than supply and demand, is the potenial of liability problems. That is a hard thing to nail down.

Comment NO: 952	User Name: SoccerPilot

I agree that the price will be negatively impacted. The manufacturers will have to buy more insurance which will be passed directly to the consumer. Add that to the proposed reg that will require instuctors to train in factory built planes and I predict many guys will quit teaching. Less instuctors = less students = less sales

Comment NO: 971	User Name: dfreeman

Based upon current industry models and projected effects, I believe these numbers are supported by the manufacturers involved with this NPRM. Some of them built aircraft for the Primary Aircraft certification program and have based their projections on that experience.

Comment NO: 1044	User Name: RFI

No comment. I would hesitate to even guess.

Comment NO: 1045	User Name: RFI

No Comment

Comment NO: 1061	User Name: terryo

I would not even guess at the cost.

Comment NO: 1120	User Name: fatplane

You already have some baseline data from Quicksilver regarding the GT500 that became certificated. As I recall, the price more than doubled to more than $37,000, and cost the company $2 million, which would have bankrupted them if a buyer didn't come on the scene with money. How many BFI's are going to come up with this amount?

Comment NO: 1152	User Name: 21214

The price of flying will double or possibly even triple. The paperwork required for compliance now will likely also double or triple.

Comment NO: 1159	User Name: rotopup

The cost per unit will be higher than FAA predicts.

Comment NO: 1165	User Name: Gyroman

No Comment

Comment NO: 1200	User Name: heronium

I think the cost will triple

Comment NO: 1201	User Name: jonvee

I think the price of LSA will go up many fold. This may cause the loss of many pilots.

Comment NO: 1241	User Name: PWPlack

Liability concerns will make factory-built Light Sport aircraft much more expensive than you estimate. They'll still be a fracton of the cost of current factory-builts, but a strong market will remain for kits among pilots willing to take responsibility for the liability which goes with construction, in exchange for much lower costs.

Comment NO: 1244	User Name: helitim

Cost estimates are still very low by FAA standards.

Comment NO: 1298	User Name: Goflyslow2

The FAA's assumption that price increases will be minimal is grossly inaccurate. Prices would be expected to increase by 60 - 120% as noted by a few manufacturers that are currently advertising such craft. ie; Kitfox

Comment NO: 1299	User Name: John Ross

The FAA's assumption is unrealistic. Prices will increase by 60 - 120% as noted by the manufacturers that are currently advertising such craft.

Comment NO: 1338	User Name: RTHOMPSON

Costs of any aircraft are pushed high in all to many cases because of the liability issue. I doubt the FAA can do much about this. In general the basic idea of the sport pilot proposal should help keep costs down for basic flying.

Comment NO: 1364	User Name: knight starr

No Comment

Comment NO: 1365	User Name: knight starr

No Comment

Comment NO: 1374	User Name: dhansen

This new pilot classification will probably create a demand for more aircraft, however with increased demand the price of the airframe will rise at least 60% and engine costs 75%

Comment NO: 1391	User Name: wolfsdens

No Comment

Comment NO: 1398	User Name: dschach

No. I believe the average light sport aircraft will be substantially more expensive than current ultralight trainers. The FAA is not factoring in the increased liability costs for manufacturers. A one million dollar lawsuit amortized over 100 aircraft adds $10,000 to the price of an airplane. A Quicksilver GT500, the first and only primary category aircraft certified sells for $32,695.00. Most ultralight trainers sell for under $20,000.

Comment NO: 1485	User Name: sleepy

From what I'm hearing from manufacturers, I would expect a marked increase for several reasons. Certification costs, liability, less volume...

Comment NO: 1525	User Name: bjmoore

I performed a word search on the entire NPRM using Microsoft Word. I used the phrases “average price” “price” “potential impact” and “potentially impacted” in my search and no results are returned. I additionally reread the entire NPRM looking for this information. I was unable to find or understand what you are asking for. I could find no average price of light sport aircraft anywhere in the document.

Comment NO: 1548	User Name: Bill Bardin

No. It is extremely inaccurate. A simple survey of the aircraft manufacturers has proven that.

Comment NO: 1564	User Name: llhoedl

No Comment

Comment NO: 1577	User Name: ultraj51

I didn't see that info don't know if it is accurate

Comment NO: 1587	User Name: Catalina36

The proosal will make flying more affordable -- and tht s clearly in America's national interest. We need a new genration of young men and women able and willing o take to the skies!

Comment NO: 1605	User Name: harveyking

Assumptions aside, the cost of new SLSP's and LSP kits will be markedly higher than prices of presently marketed U/Ls. This will be because of issues not presently addressed, such as the fact that U/Ls use engines that are not at certificated engine standards for reliablity. The fact that the manufacture will be part of the life of the A/C, which is not the situation today. This will depend in great part on the industry standards.

Comment NO: 1610	User Name: davidbauch

No, I suspect the FAA's estimates are much to low.

Comment NO: 1643	User Name: live2av8

NO, it would appear they'll cost much more than you've proposed, based upon the few ascertainable details released thus far. -live2av8-

Comment NO: 1657	User Name: JSTO1

I could not find the data in the attached NPRM. However, in general the cost estimate will be low. Until there is more tort reform, to correct where juries award millions and sometimes billions, the costs will soar for liability insurance alone. The new kits will become more viable and popular as a means to limit liability to the manufacturer.

Comment NO: 1714	User Name: Pam

The cost of transitioning to LSP is going to run many of the current UL pilot off

Comment NO: 1796	User Name: steve.stefanic

No Comment

Comment NO: 1813	User Name: frjn33

As others have pointed out, it is difficult to discern what your estimate might be, since you do not point out your estimate in your question. There is no, absolutely NO way that the increase in price for a genuine, factory-built, FAA approved certificated special sport light aircraft to be affordable to many of us who would like instruct after this proposed rule is implimented. You seem to be cutting out ultralight instructors, right? Then you turn around and make the price for sport light instructors to own an approved aircraft out of reach for most of us. The genius of ultralighting was its simplicity. A great many positive strides have been made in aircraft on the light end of the spectrum because of ultralighting's affordability and simplicity. Please do not turn the light end of the spectrum into something that only the high-rollers can afford.

Comment NO: 1820	User Name: DFE

Well, we really cannot know this until we see what the standards are, can we? I manufacture an Ultralight. When I get any type of certification with purchased materials and parts, I file them. AN bolts, aluminum tubing, and such. I have CAD drawings of many of the parts, but not all. I purchase cloth seats from a reputable source. Should I have some type of documentation, other than the pattern, for such parts? I do not segregate my AN hardware by lot number. Would this be necessary? Would I have to be able to identify every aircraft that had a particular size bolt from a particular lot #? The devil is in the details. If you increase manufacturing costs significantly, it will limit the participants, both manufacturers and pilots.

Comment NO: 1840	User Name: megamouse

Have no data, but cost of regulation is high. Reasons, are 1)limited sources, 2) High cost of getting approval, 3) Not allowed to use unapproved but technically sound alternatives, and 4) added cost of manufacture an airworthy quality product.

Question Number 14 - In response to the June 1, 1998, Presidential memorandum regarding the use of plain language, the FAA re-examined the writing style currently used in the development of regulations. The memorandum requires Federal agencies to communicate clearly with the public. The FAA drafted this proposal using plain language writing techniques "Is the style of this document clear and did you find it easy to understand?"

(14) In response to the June 1, 1998, Presidential memorandum regarding the use of plain language, the FAA re-examined the writing style currently used in the development of regulations. The memorandum requires Federal agencies to communicate clearly with the public. The FAA drafted this proposal using plain language writing techniques "Is the style of this document clear and did you find it easy to understand?"

Visited: 170	Total Comments: 80	Last Post: 5/6/02

Comment NO: 13 **User Name: Comperini**

No Comment

Comment NO: 40 **User Name: delta2ul**

As a stand alone document, no it was not easy. However, in it's proper context of a change to existing regulations, I found that with a reasonable amount of effort, the proposed regulation is understandable. However, much of the potential impact of this regulation will be contained in items such as the operational limitations assigned to each individual aircraft. It is unfortunate that this information is not yet available. Until it is, a true judgement of the impact and costs of compliance cannot be made.

Comment NO: 75 **User Name: flyfree**

You've got to be kidding. No.

Comment NO: 90 **User Name: Bradley**

It's fairly understandable, but I don't like much of what it's attempting to say!

Comment NO: 107 **User Name: artspain**

Would I call it Plain English: NO. Is it easier to understand and clearer than existing regulations: YES!!!

Comment NO: 116 **User Name: Bill Cartwright**

Part-103 is easy to read and understand, Sport Pilot leaves holes so big I could fly thru them and which way will the FAA close it? For or against or the middle of the road? No,this is a complex piece of work and I would rather play chess than figure this one out!

Comment NO: 131 **User Name: w1bfn**

No Comment

Comment NO: 132 **User Name: w1bfn**

No Comment

Comment NO: 148 **User Name: daberti**

Generally it is easier to read than any other government published document but still requires re-reading much of the time to gain an understanding.

Comment NO: 165 **User Name: barnesrc**

It is easier to read than the FAR/Aim, but it is not easy to read. I would not try and simplify it any

more though.

Comment NO: 181	User Name: Ultraliteteacher

There should be 2 forms of communication from the FAA. One is the legaleze accurate rule FAR language, and then plain speak commentary. The NPRM, being interspersed amongst the existing reg's loses its readability without such context. If end to end summaries could be made, then readability would be increased. For instance, take a Part 103 pilot and run him start to finish what is needed. Then do the same for a GA pilot. Your NPRM has several tables that start down this road, but are incomplete. The most common question seems to be 'how does it affect me?' The other problem is once the NPRM is read by a Part-103 candidate, the true implications of FAR 91 are not apparent. For example, the majority of Part 103 flying occurs at an altitude of less than 500 feet AGL (not over congested areas). 91.119(c) says 500' minimum unless over the more rare 'sparsely populated' areas. This ends up a safety issue, since if we adhere to 91.119(c) then we will be sharing the GA airspace more than we do now. Since we have the ability to fly safely at lower altitudes, many favor flying at altitudes where the GA aircraft are not. However, the NPRM mentions nothing of this and only Part 103 pilots with GA experience are likely to observe such problems or issues with the NPRM. If the pilot scenarios had the FAR's cross referenced by typical examples, this would be more meaningful.

Comment NO: 204	User Name: sthomason

Its easier than most legal documents, although it's scope is so large it takes some time to wade through it all.

Comment NO: 224	User Name: Batson

Not bad. I could read the proposal with ease. It much better than past documents.

Comment NO: 304	User Name: deeph2o

I found it clear and easy reading.

Comment NO: 338	User Name: garyo

Yes. I agree that it is written better however that doesn't make up for the unaswered questions it proposes nor the number of times it contradicts itself. Easy to read but not to understand your full intent.

Comment NO: 369	User Name: bobkat

Pretty well written and readable

Comment NO: 371	User Name: jwalters

YES.

Comment NO: 413	User Name: wjwil

You call this simple.It's a book in itself.The language is simple but it could have been condensed.

Comment NO: 415	User Name: ch900

I was pleased with the improvement in language and readability.

Comment NO: 424	User Name: DartHere

No It appeared to be designed to be ambiguous. While touting the advantages it understated the disadvantages. It represented facts in such a way to support a pre-conceived plan. It lacks detail; it treats all of the different types of aircraft as a group, without considering the advantages and disadvantages that the NPRM will have on each of the different types.

Comment NO: 426	User Name: pat

yes. but it still has a way to go.

Comment NO: 454	User Name: hawkul

You have got to be kidding. Your question and answer section leaves out so much stuff it is useless. To fully understand what appears to be a simple statement requires a search through

existing FARs. The preamble contradicts what is actually written in the actual regs in the last section. I am used to dealing with construction contracts and other complicated legal documents but I had to read this thing several times and I still have to do a lot of searching to answer a question. No reason for this to be this complicated.

Comment NO: 511	**User Name: William G. macIntyre**

No comment.

Comment NO: 523	User Name: Taylorcraft078

It is still not clearly worded but is better than the FARs. I write and critique technical documents as part of my job. It was difficult to determine if my son would be able to do a check ride in my Taylorcraft BC-12-65.

Comment NO: 554	User Name: 584241

Somewhat better than my last 50 years experience.

Comment NO: 557	User Name: 12rick

Although the document is easy to read (I have read through it three times) and relatively clear, there are still remain a number of points about which I am unclear. The EAA's and the AOPA's simplified interpretations are somewhat helpful, although they are only that, interpretations, and perhaps not legally correct.

Comment NO: 559	User Name: Steve

Still had to read several times, But much better than most.

Comment NO: 560	User Name: dmyhra

It can use a little more work to make the future documents clear.

Comment NO: 592	User Name: glaunt

Yes...thank you for that.

Comment NO: 600	User Name: goluscombe

I disagree, but only mildly. What is written and what is meant are tweo different things. The EAA did a good job of interpreting ther regulations. If the FAA is looking for understanding, then commentary of the the regaulations will go a long way to eliminating confusion. I can understand a certain amount of "snow blidness" both on the part of the writer and reader can occur. This proposal was mostly well-written, but a few things hinged on a single word and each word needed to be carefully cindiered in order to understand its meaning. People, in general, would not subject written text to such scrutiny, in general.

Comment NO: 603	User Name: Triplek45

I disagree; I think it is very hard to understand,I think the FAA has taken a simple request and turned it into an unbelievable monstrosity. But then I realise that the word "Simple" is not in FAA's vocabulary.

Comment NO: 631	User Name: cec1155

I think it's better.

Comment NO: 688	User Name: stewart

I have read the proposal several times, and I found it to be much better than the "Old" regs. However, there are several area's that need further clarification.

Comment NO: 701	User Name: mccoy3

I found the writing much better than present FAR's.

Comment NO: 716	User Name: Steve

I did not need to hire a lawyer if that is what you mean. A deffinate improvement.

Comment NO: 733	User Name: slowflyer

I agree. The proposal is easier to read than previous documents issued by the government. I especially appreciate this on-line forum to give people a chance to respond in a quick and easy manner. I hope the FAA is listening.

Comment NO: 744	User Name: towpilot

I think the entire proposal was very well written and easy to understand. It is obvious to me that a lot of care went into the final NPRM to make sure that a complex issue like this was made as understandable as it could be made. I sincerely appreciate the effort that went into not only the formulation of the rule but also its presentation. Well done!

Comment NO: 779	User Name: Rich Wallin

It is better, but there is still room for improvement.

Comment NO: 784	User Name: Wayne McIntosh

I can understand it better than other government documents. However it is long and refers to other documents and so is still hard to read. I would like the final regulation to be shorter and have everything I need to know in one document even if it requires the FAA to print portions of other documents in the final regulation. I have heard commercial pilots and flight instructors disagreeing on some part of the FAR's. If it was all in one book it would make flying safer because you could refer to that book if a question arose. Remember this is supposed to be simple safe recreational flying.

Comment NO: 794	User Name: airgus

Not only the language, but also the format (like this online forum) make this proposal much more transparent than other government publications.

Comment NO: 839	User Name: gkrug

Legalese can never be made totally clear, but I can understand what is written. It could have been much worse.

Comment NO: 866	User Name: David Hodgson

No Comment

Comment NO: 907	User Name: tbrandt

In many ways yes. The charts and question/answer are helpful. Yet given the complex nature of the NPRM and the interaction of various parts it is sometimes difficult to see and understand all of the connections

Comment NO: 950	User Name: whiteman

I agree. It adhears to the letter and spirit of the law. I also would like to commend the use of the internet for distrubution of the NPRM and its use in the comment period.

Comment NO: 972	User Name: dfreeman

I disagree. This is a good attempt at drafting a proposal that is clear and easy to understand. However, due to the complexity of the proposal and the many variables, it still is very hard to follow and requires many readings as well as further interpretation from the FAA as well as others who have been in constant communication with the FAA. As a layperson, with very little training in reading and writing government regulations and or drafts, I find it quite confusing.

Comment NO: 993	User Name: Ro

Yes-easy to understand. It is good to be able to read and understand something from the Goverment-Thanks!

Comment NO: 1020	User Name: Harold E. Thomas

I find it very good and a significant improvement over other FAA documents such as AD,s and regulations. Keep up the good work and the intent of this program.

Comment NO: 1046	User Name: RFI

In general, yes. It was fairly well written, concise and easy to understand.

Comment NO: 1121	User Name: fatplane

Well written, easily understandable.

Comment NO: 1155	User Name: 21214

Here's the current problem; Interpretation. Already one FAA office will say that this means one thing, but another will say it means another. The burdon of proof always ends up on the pilot or aircraft owner who likely will (in extreme cases) end up spending their life savings in the legal system getting someone to understand that a rule means this and not that. It's a big problem. Look right now at how many inspectors are putting a catagory and class restriction on gyroplanes when, as experimentals they don't fall under these rules. So a Private fixed winger can fly a gyroplane without further indorsments, but half the AW inspectors in the country don't understand that. Clear, plain, english rules that are NOT open to local Interpretation are vital.

Comment NO: 1162	User Name: rotopup

Having a 25 year aircraft maintenance background and daily dealing with AD's, this is much clearer language. There is still the huge probablilty of points being misinterpreted.

Comment NO: 1166	User Name: Gyroman

This document is not as easy to read as was anticipated--- there is much room for interpertation by the FAA ---

Comment NO: 1202	User Name: heronium

NO

Comment NO: 1203	User Name: jonvee

No Comment

Comment NO: 1213	User Name: narrowacre

"Is the style of this document clear and did you find it easy to understand?" aMBIGUOUS when mixed with AGREE-DISAGREE marks. EXAMPLE QUESTION 8: (The results of AGREE-DISAGREE will be abiguous because it is not clear whether I am agreeing with the FAA excluding gyros or the question of reconsidering inclusion).

Comment NO: 1243	User Name: PWPlack

I believe the FAA tried its best on the NPRM. It was less successful on this questionnaire. I believe I understand the NPRM but, since many apparently bright people see issues in it which I do not, it would be premature to say you've made it "easy to understand."

Comment NO: 1246	User Name: helitim

It is an improvement with room for more.

Comment NO: 1259	User Name: George

No rule will ever be like reading the comics but, all in all, this is quite understandable

Comment NO: 1318	User Name: lsippell

The way a few of the questions are worded, I don't know if I should agree or disagree.

Comment NO: 1339	User Name: RTHOMPSON

It was better than most goverment issued documents.

Comment NO: 1392	User Name: wolfsdens

No Comment

Comment NO: 1393	User Name: wolfsdens

No Comment

Comment NO: 1414	User Name: humair14

I found the NPRM as readable and understandable as any current regulation. Not much improvement I fear. I find the questions a little hard to understand as to what we are ageeing or disagreeing with.

Comment NO: 1486	User Name: sleepy

Easier to read, maybe. Because of the complexities, divesity of the class and/or types of craft involved I have found it confusing and hear a lot of confusion in discussions about the regulation. There seems to be a lot of merit in simply fine tuning Part 103, least as seen from my view as a powered parachute pilot.

Comment NO: 1526	User Name: bjmoore

I found the document readable, and the question answer format refreshing. However, I found myself asking many questions after the first two readings, due to items raised, but not expounded upon, and in referencing of other sections of FAR's that will be unavailable to the typical ultralight pilot, who will be a significant part of the audience that the NPRM is addressed to. For example from the NPRM: "Proposed § 89.section 191 of SFAR 89 would require a sport pilot to comply with the recent flight experience requirements under § 61.57, which is applicable to all other pilots. The FAA thinks that the recent flight experience requirements for persons acting as pilot in command are minimum standards that should apply to all certificated pilots. We do not find any benefit to making this requirement less restrictive. Proposed § 89.section 193 of SFAR 89 would require a sport pilot to comply with the flight review requirements under § 61.56, which is applicable to all other pilots. As with proposed § 89.section 191 of SFAR 89, the FAA thinks that the flight review requirements for persons acting as pilot in command are minimum standards that should apply to all certificated pilots, and we do not find any benefit to making this requirement less restrictive. " Any document must be written with the audience in mind. From the perspective of the audience who does not come from general aviation into Sport Pilot, but who is new, or learning, why are we referencing and not explaining what these requirements are within the NPRM? Unless you have a copy of FAR AIM in hand, a reader is left in the dark as to what these requirements actually entail. Some statement such as "a flight review requires a 1-3 hour review from a certified flight instructor that may include written, oral, and a practical flight demonstration" should be included. These are not the only portions of the rule that reference other areas of the FAR not included in the NPRM. To fully understand the rule, the reader is required to obtain a copy of FAR AIM. Additionally, this is referencing other parts of the FAR's that were written prior to the 1998 Presidential memorandum, thus plain language writing techniques are avoided in explanation of these facets of the NPRM. In these two examples, these requirements are subtly stated, such that the BFR and flight currency requirements are not understood by the first time reader not in possession of all FAR's. The NPRM is unclear in many areas. Two that come to mind are "deviation authority" and the authorized capabilities of the repairman with an inspection rating. Deviation authority is at best given a cursory review. To who does deviation authority apply? What is the intent of deviation authority? What will be the criteria for granting, or rejecting deviation authority? In my first readings I saw that deviation authority could be granted to converted ultralight exempted trainers to LSA trainers, if no "special" certified version of a particular make and model is available in a particular area. Is this the case? What is the intent of deviation authority? Several questions are left unanswered in the NPRM. It has been explained by the FAA and can be found on the UL organization websites that the inspection rated repairman can perform all repairs on his own experimental LSA. This is not stated, nor clarified in the NPRM. Thus, I am grateful for the attempt to provide a readable rule, but somewhat disappointed in its execution.

Comment NO: 1533	User Name: James Paul

This effort by the FAA is, from top to bottom, the best I have ever seen from the FAA or indeed, any US Government agency.

Comment NO: 1549	User Name: Bill Bardin

No.

Comment NO: 1565	User Name: llhoedl

No Comment

Comment NO: 1588	User Name: Catalina36

No Comment

Comment NO: 1611	User Name: davidbauch

"Is the style of this document clear and did you find it easy to understand?" Well, it is easier to understand than the instructions from the IRS.

Comment NO: 1644	User Name: live2av8

YES and YES, although I feel the proposal in general is farther in depth than it needs to be in resolving the original objective of the ARAC. A third of the papes would've been plenty. I just couldn't understand how the proposal will resolve the original industry issues regarding single and 2-place fat/fast ultralights. The original objective which started it all, USUA's petition for rule change in April 1988. FOURTEEN YEARS AGO! -live2av8-

Comment NO: 1659	User Name: JSTO1

It was better then most specifications I have read.

Comment NO: 1686	User Name: john brady

The language in NPRM has been about as clear as you can make it. Hope we cankeep clear without too many additions or changes to this or that. Keep it like it reads.

Comment NO: 1704	User Name: frjn33

The writing style is much improved over other government documents that I have encountered. However, there are some areas that still seem ambiguous. I suspect the cause of this is that some issues have not been worked through yet. You're doing very well in making the language understandable. Keep at it! Fr. John Elledge

Comment NO: 1736	User Name: Spdrflyr

This document is one of the most convoluted and unclear pieces of writing I have ever seen. We only have question after question after question. And getting answers from the FAA ain't been easy...every time we seem to get a different answer to the same question.

Comment NO: 1758	User Name: BigSkyAviation

The NPRM is not plain easily understood language. Read part 103 to see an example of plain language.

Comment NO: 1771	User Name: edburkhead

I'd compliment the FAA's writers on the plane language translation of the NPRM. I found the NPRM to be laden with references to other sections and documents not readily available. Some clauses and sections left me not knowing what they mean because of the referrals to non-available information. There were a few convoluted sentences, which left me in doubt, but not many. It was FAR better than most bureaucratic writing!

Comment NO: 1797	User Name: steve.stefanic

Excellent use of open language in this document. You are to be lauded for your open-mindedness in talking to the "average Joe". Keep building on this & more of us will comprehend the regulations.

Comment NO: 1837	User Name: kpcp

This Light-Sport proposal was a giant step in the correct direction towards using plain English language. When writing proposed concensus airworthiness standards, the ASTM Committee individuals should be challenged to write in plain language.

Comment NO: 1841	User Name: megamouse

I don't think it will be easy to understand by new sport pilots unfamiliar with current CFR regs.

Question Number 15 - Do you have any other issues that you think should be addressed related to Light-Sport Aircraft policy?

(15) Do you have any other issues that you think should be addressed related to Light-Sport Aircraft policy?

Visited: 558	Total Comments: 143	Last Post: 5/7/02

Comment NO: 32 **User Name: DartHere**

There is a lack of ability to ask questions about some of the more vague areas on the NPRM. You call the number listed in the NPRM for asking questions and you don't get a response or if you do get a response the person isn't sure what the answer is. This shows a need to refine the process and a means to answer each question that arises. Questions could be submitted by E-mail or Fax with written responses returning in a like manner. Some example questions that still need answers are as follows: A) If the manufactures return a "Consensus Standard" that does not include the requirement of "Type Certificated" engines for SLAC, will the FAA approve it? B) According to NPRM 5372 a kit manufacture must build at least one SLAC before he can start building kit ELACs, If a "Type Certificated" engine is required on the SLAC, will the manufacture be able to build the ELAC without the "Type Certificated" engine? C) If the manufacture can change to a non-certificated engine in the ELAC, then what else can he change in the use of materials and design? What is the point of requiring the manufacture to build one SLAC if they can change the standards in the ELAC model? D) Has anyone poled the DAR's and ask who would be willing to sign-off the old and new Light Aircrafts in each of the Types? How much will they charge? If the DAR does not have experience in PPG or Weight-shift how can he sign it off? E) How many APs will be willing and able to work on PPG and Weight-shift aircraft? Because of the way many APs view Ultralights they may not be as willing as the FAA thinks. If you can't get someone to do the work, what will you do? F) In NPRM 5397 (Analysis of Alternatives) The FAA states the reason they don't want to stay with the "Status Quo", but I don't see any review of why they didn't want to make the "Status Quo" a permanent FAR or SFAR as is the present proposal. Could the present exemption be made a permanent FAR or SFAR? If not, why not?

Comment NO: 35 **User Name: DartHere**

This Whole "On-line Questions is a JOKE The comments that I submitted are truncated when displayed for viewing. If your going to limit people how much your going to display, how can you get a dialog going?

Comment NO: 44 **User Name: delta2ul**

I feel that biannual flight reviews are an unnecessary financial burden on the Light Sport pilot. I believe that a threshold of current experience should be in place in lieu of the flight review, ie. if you have less than x number of hours of flight time in the last 24 months, and less than y number of hours in the last 12 months, a flight review will be required before exercising the privledges of the certificate. Also, I believe that the 16 hours of training for inspection authority be divided into two equal segements: standard practices (materials, fasteners, etc.) and make only (not model) specific. I feel that 16 hours of make/model is too restrictive and will unnecessarily raise the burden and cost of both presenters of the training as well as the attendees.

Comment NO: 61 **User Name: cbranagh**

Yes. As discussed in question seven the concern for an airplanes ability to do damage as represented by its kinetic energy is really a matter of both speed and mass. I believe the proposed weight restriction of 1230 pounds is to low. The reality slow speeds of aircraft certified years ago, such as ercoupes,cessna 140/150, etc., should put them in the sport plane category. These aircraft are proven designs that are simple and easy to fly which should not pose any safety problems when flown by a sport pilot.

Comment NO: 76	User Name: flyfree

Yes. FAR 103 single place ultralight pilots should have to get at least a minimal level of ground instruction and be registered. Maybe 6 hours. Pretty hard to expect them to follow the rules if they never had to learn them.

Comment NO: 91	User Name: Bradley

Expand and retain FAR 103. Don't try to fix the parts that aren't really broke.

Comment NO: 111	User Name: Bill Cartwright

My issue is the existing AFI's that suposed to become DARS and such. I believe you fell short on this issue as no one can afford to go to Okl. for a 2 week training. Remember you are robbing the Ultralights of their Trainers, their AFI's and their BFI as well. I think you should go to the GA arena and recrute the CFI's for your new boys,SPCFI, as they have not given up anything so far. I feel the changing of 3 parts of Part-1-3 would have taken care of what has cost millions in tax dollars not to mention the Billions yet to come. This robbing Peter to pay Paul approach is not the way to resolve this problem. And since when could I land at SFO or LAX in an Ultralight and be legal? When I become Sport Pilot. Do you really want slow UL trainers trying to foolheartly duke it out with a 747. B airspace should be off limits as far as trying to land at that particular airport. And 10K feet? I can go up to 16500 in my Ul should I use oxygen and GA as well! Why would such a rule be placed on the books!

Comment NO: 133	User Name: w1bfn

No Comment

Comment NO: 134	User Name: w1bfn

No Comment

Comment NO: 135	User Name: w1bfn

Kudos on your attempt to make it easy for "us" to participate in the venture. It will be very interesting to see how all these comments are taken and analyzed. This is a good rule, and deserves all our attention.

Comment NO: 150	User Name: daberti

No Comment

Comment NO: 166	User Name: barnesrc

No Comment

Comment NO: 182	User Name: Ultraliteteacher

The NPRM gave lip service to the ultralight AFI's becomming the DAR's and DPE's. Nothing was carried forward to the NPRM to allow this possibility. As is, the UL/SP DAR and DPE must be of the same training and from the group of GA DAR and DPE's. From all accounts, the GA group want little to do with the aircraft that the NPRM covers. I agree that the BFI's that exist now would be the correct group to train SP after getting any needed training. For instance, a BFI/AFI/UFI/etc that is a private pilot or better, having taken the FOI test, should need nothing more than a sign off to be a DPE. With the BFI and without the GA ticket, one could be a SP Instructor. There has been very little, if any, statistic data available indicating a FAA DPE or CFI could do better than the group that has been doing this training for 20 years.

Comment NO: 183	User Name: Ultraliteteacher

The altitude limit should be raised to 18,000. If a Cessna 152 can make it that high, it would be at a speed similar to the max allowable in the NPRM. The extensive training that GA gets for high altitude flight is contained in ONE FAR (91.211). There is no reason that the SP candidate cannot learn this one FAR. The gain in safety would be substantial over the mountainous western regions. 2000AGL over is not adequate. The higher you are, the more likely you'd live through an engine out. This rule alteration would also allow gliders, who otherwise fit well in our rules, to fit

in. One cannot cross the Rockies in the best gliger with a 2000AGL cap.

Comment NO: 184	**User Name: Ultraliteteacher**

I agree that the BFR is a good idea on the surface, but the make/model implications to the instructor are unworkable. Use category/class and this becomes managable.

Comment NO: 185	**User Name: Ultraliteteacher**

Make/model should in all cases be re-worded category/class. It would be reasonable to expand Category to include: fixed wing, weight-shift (trike), parachute, hot air balloon, gas balloon, gyrocraft, etc. Expand class to include: land(wheels), sea, powered, unpowered.

Comment NO: 186	**User Name: Ultraliteteacher**

The FAA should send the safety data sheets to each and every person that is affiliated with any of the 'alphabet org's'. This would satisfy one of the FAA's existing goals without much effort, and could start tomorrow.

Comment NO: 187	**User Name: Ultraliteteacher**

There needs to be accomodations for UL towing operations to continue similar to as is.

Comment NO: 188	**User Name: Ultraliteteacher**

Why disallow training in ANY experimental aircraft? OK, let's limit this to NPRM. Any experimental certificated aircraft will have at least as many, if not more inspections as any proposed trainer will have. So they will be airworthy. If they are allowed to carry passengers at all, certainly a student would be able to make a more informed choice to his own safety than any arbitrary passenger. The student will be shown the pre-flight in most instances, the casual passenger would not. Why disallow such a worthy aircraft from instruction for hire? Better access to instruction should be a hallmark strived for by the FAA at EVERY possible opportunity.

Comment NO: 189	**User Name: Ultraliteteacher**

No one has shown Part 103 and it's training exemptions to be inherently bad or evil. Why not SFAR the exemption in addition to the NPRM? Exemption holders would train part 103 pilots and SPI would be the lead stepping stone for a GA ticket.

Comment NO: 190	**User Name: Ultraliteteacher**

Has anyone polled the GA FBO's to see how warmly they will embrace this NPRM? How about how many would respect the instruction given by a SPI as an equivalent start for GA training? While technically the SPI training will count for GA, I doubt in practice this will be more meaningful to the CFI than the handfull of flights as a teen with your uncle. The break in training continuity would upset the logical GA training rituals.

Comment NO: 191	**User Name: Ultraliteteacher**

Please state how many ultralight (Part 103) accidents would have been avoided by 'real world' compliance with this NPRM. I suspect the number will hover near zero. Your reply is requested.

Comment NO: 192	**User Name: Ultraliteteacher**

Was it a conscious choice to disallow the popular primary GA trainers from this NPRM (152, Tomohawk, Skipper)? The GA trainers are proven workhorses with an excellent safety record. The GA training includes soloing at about 10 hours. Incredibly, many UL's solo at 10 too! Your response is requested.

Comment NO: 205	**User Name: sthomason**

We should have weight allowances for floats, a BRS, and other safety items. I also think the gross weight should be increased to 600 kg (1320 lbs). Those of us who have expanded around the middle and would like to take our wives/sons/daughters over to the next state (with full fuel) for a trip with an overnight bag will need the few extra pounds allowance! Of course if this puts us at odds with European and Austrailan rules, then maybe not...

Comment NO: 225	**User Name: Batson**

No. But I again urge you to issue the rule as is ASAP. GA really needs help.

Comment NO: 229	User Name: capella1

Cockpit controllable propellers have been used for many years in this category of aircraft. Additional training and logbook endorsements for "complex" features should be provided for, IE: "Controllable Propeller", "Retractable Landing Gear". Needed especially for floatplanes.

Comment NO: 232	User Name: capella1

The 87kt student solo speed limitation and the "high speed" endorsement should be eliminated since pilot familiarization and training specific to each aircraft are already addressed by the requirement for a make-model endorsement. Two trainers not necessary or cost effective.

Comment NO: 236	User Name: capella1

44kt VS1 limitation for aircraft equipped with high lift devices should be eliminated as redundant in lieu of the 115kt VH limitation. VS1 limitation does not parallel other similar categories worldwide and results in unecessary design constraint. VH is the only "catch all" limitation that is needed.

Comment NO: 238	User Name: nleggett

Please devote more effort to supporting balloon and airship operation under the proposal. Airships offer a great platform for quiet and delightful sport flying. Nickolaus E. Leggett, Private Pilot

Comment NO: 240	User Name: capella1

DPE must be permitted to conduct flight examination by observation from the ground, due to the level of diverse aircraft that may be encountered and the unlikely scope of experience in all make-models that DPE may encounter, including single seat only models.

Comment NO: 243	User Name: capella1

Sport Pilot Instructors should be permitted to conduct sales demo flights. If they are experienced enough to conduct training they should be experienced enough to conduct demo flights.

Comment NO: 246	User Name: Dennis

The gross weight limit of 1232 lbs seems arbitrary. PA-18's should be the top limit to meet the spirit and intent of the regulations. Top speed limitation is unneccessary. Cockpit adjustable propellers would improve safety.

Comment NO: 251	User Name: nleggett

Please ask the commentators if they think that 20 hours of instruction is enough to be a safe sport pilot? It may not be enough for flying when conditions get poor. Nickolaus E. Leggett, Private Pilot

Comment NO: 271	User Name: dalemseitzer

1. Raise 103 weight to 330 lbs. 2. Raise 103 top speed to 87 mph 3. Keep ultralight training exemption forever. 4. Make Recreational Pilot a drivers license medical, have a weight limit of 1700 lbs. gross, 1 passenger, 160 max hp, stall speed 45 mph. 5 Allow BFI's to be Sport pilot instructors with experience requirement, written testing, flight check and inspection of the plane. 6. Require training for 103 ultralights.

Comment NO: 278	User Name: Barac

I believe a provision should be made to allow existing factory built aircraft that would meet the eventual consensus standard to be approved for special-LSA airworthyness. LSA salespeople should be allowed to demo aircraft with a minimum certification of CFI-SP or Private Pilot or higher with a minimum PIC time. Towing should be allowed by LSA with a pilot having minimum certification of CFI-SP or Private Pilot or higher with a minimum PIC time. Part 103 exemptions should remain in effect to provide a instruction method for remaining Part 103 pilots.

Comment NO: 283	User Name: delta2ul

Part 103 vehicles really need to be allowed to weigh a little more. 300 pounds would allow

existing designs to meet 103 and still be reliable and safe vehicles. Trying to meet the 254 pound limit means giving up safety and reliability, one of the reasons that many ultralights are overweight. The fuel and speed restrictions are in keeping with the nature of the vehicles.

Comment NO: 285	**User Name: flyfree**

It would appear that there are WAY too many loose ends in the proposal as it stands today. I feel the comment period should be extended another 90 days as all of the issues will never be resolved by May 6th.

Comment NO: 290	**User Name: Joe G**

This "sweeping Part 103 and exempt trainers under the rug" is the unacceptable part of this proposal. Most (what we call)"FAT UL's" flying today, both single and two-seaters, are far from meeting certification and registration standards for light-sport aircraft under this proposal. They are all ten-times safer and more airworthy than the "vehicles" envisioned by the FAA in 1982, when Part 103 was published. Ultralight flight in feeding into general aviation everyday (which does not appear to have been taken seriously todate, in this proposal). It is in the general public best interest, as well as general avaition, to allow what has already been proven to be safe and successful to continue. Upgrade Part 103 in conjunction with this proposal.

Comment NO: 298	**User Name: EricDL**

Runway Incursion avoidance and operations close to airports should be highly emphasized in this training. I am aware of the restriction around busy airports, but often the moderately busy uncontrolled airports are much more confusing to operate in and around than Class C airports. Most pilots learn the proper techniques of aircraft spacing, taxiing in busy traffic, and general airport politeness and curteousness from building hours in training at the facilities. These situations are often the most stressful and intimidating to recently certificated private pilots with 60-80 hours under their belt, that makes me wonder about sharing that space with pilots who have 20-30 hours. With the additional stress of having a questioning or talkative passenger, I believe that many low hour pilots would be unable to manage the situation effectively.

Comment NO: 303	**User Name: deeph2o**

I repeat that I would very much like to get my license but do not think shortcuts like this one are good for the safety and security of our general public. I will get a license when I can afford it and have the time to properly prepare for the responsibility. I do not want the same jerks who jump behind the wheel of an automobile and think they are the only ones on the road to get a license they do not have to earn with long hours of study and a considerable degree of commitment. With the current licensing only the people who make flying, and safe flying, a monitary and temporal priority are in the air and I think that is the way it should stay, even if it means I have to wait or never can complete my license.

Comment NO: 372	**User Name: bobkat**

The gross weights of these planes are too low, excluding a large nunmber of potential FAA-certified trainers - cubs, champs, cessnas. A gross weight of the average basic trainer, e.g. C-150-152 as long as the landing(stall) speed is slow should be approved.

Comment NO: 373	**User Name: jwalters**

YES.... AND THIS IS VERY IMPORTANT. CARGO HAULING! PATICULARY IN ALASKA. HOW SO FEW AND SO MANY IN THIS STATE ALONE COULD REAP THE BENEFITS OF TRULY INEXPENSIVE CARGO HAULING.NUFF SAID

Comment NO: 416	**User Name: wjwil**

Safety should be at the fore front in aviation.Require the correct training,give the sport pilot proven aircraft,such as the Aeronaca,Piper Cubs,Citabria,Luscombe,Taylorcraft,Cessna and many more simple,proven two seat designs to fly,regular performance reviews (yearly for 3 years then biennal)then the proposal will benefit.Don't let special interest groups dictate the proposal.

Comment NO: 423	User Name: 12rick

Overall, I believe that the proposed rule will have a positive effect. My objection lies with the hypocracy of the rule as written, first in not permitting a Standard certified aircraft with a weight at take off of less than 1232 pounds to be flown under the Sport pilot rule just because the plane's certified gross weight might be listed as few pounds over 1232 pounds. Secondly,from a purely scientific standpoint, based upon the formula for kinetic energy,E=1/2mv squared, an aircraft that lls within the Sport Aircraft classification, i.e. a maximum weight of 1232 pounds and a maximum level flight speed of 115 kts., will at that 115 kt. speed in reality have the same kinetic energy as a 1400 pound aircraft with a maximum level flight speed of 108 kts. or a 1805 pound aircraft with a maximum level flight speed of 95 kts. Not only from a scientific standpoint, but also from a student pilot safty standpoint, maximum weight relative to maximum speed should be raised. When those new student Sport Pilots go to solo, the Sport aircraft without the instructor will weigh not much more that 1000 pounds. Thirdly, since a Sport Pilot will not be permitted to pilot an aircraft on international flights, basing our weight standard on some arbatrary international maximum weight for Sport aircraft is not a valid justification. Does the United States have too follow in some other countries footsteps?

Comment NO: 445	User Name: capella1

It is time for the UL community to get with the program. The non-flying public, other pilots, airport operators, and airline passengers have a right to expect that ANY user of the airspace possesses the knowledge and skill to share it safely. How can it be claimed that public air safety is served when FAR Part 103 does not require the demonstration of ANY related knowledge! Such allowance defies all reason. As a minimum, even the operators of LEGAL Ultralight Vehicles should be required to pass an FAA written examination to show that they have at least received and understood the “rules of the road”. Many Ultralighters seem to be suggesting that FAA make the UL training exemption a permanent part of FAR Part 103, and then “make legal” the operation of so called “Fat Ultralights” for those that participate in a training program. Sounds like doing that would result in Sport Pilot. Thank you FAA for “fixing Part 103”! Stop kidding yourselves and join the club. Take the test, register your AIRCRAFT, and then you can stop looking over your shoulder and fly for fun.

Comment NO: 455	User Name: hawkul

At least a dozen but the timer would cut me off before I could address them. One subject I will address is the fact that the FAA is useing the EAA and the ASC as the condits for information. This information is distorted before it gets to the public. There are still inaccuracies in the explanations on their websites. You have a website that should be used for distributing information to the public. I would like to point out that there is a severe conflict of interest here. This proposal combines too many different questions affecting too many people. It would have been much better to present the DL medical as one NPRM, the sport pilot as another NPRM, the sport plane as another NPRM and changes to part 103 as still another NPRM.

Comment NO: 472	User Name: Dave Jackson

For the future of US light aviation. I believe that it is possible to produce a much safer helicopter, for [Aircraft Certification]. It then will be possible for this helicopter to result in a simpler license, for [Pilot Certification]. However, it is questionable whether the design and construction of this helicopter can be simple enough to allow for a [Repairman Certification]. A hope is that specific component assemblies of the craft might be certified and sealed. The pilot / repairman is then only allow to inspect and replace these complete and certified assemblies. This could be a compromise between today's uncertified craft and a fully certified craft. An example of this might be a helicopter that has unlimited-life composite blades and fuselage while the rotor hub and transmission are certified and sealed. This will result in a helicopter and pilots license that is expensive from a homebuilt/ultralight perspective, but inexpensive from a conventional helicopter perspective.

Comment NO: 522	User Name: Taylorcraft078

Simplify the NPRM as it is still difficult to follow. Add owner maintenance as an option of certificated planes that are no longer supported (Champ, Taylorcraft, Luscombe) by manufacturers.

Comment NO: 550	User Name: slowflyer

Yes. There is a grave concern that has been overlooked. Powered Parachutes (ppc's) have a top speed of 25-30 mph. Once these machines have an N-number, they will be allowed into airports. With these extremely slow speeds, does the FAA think it's wise to combine much faster aircraft with these slow ones? Please remember they also drop the chute once it slows down on the runway. Many pilots would not want them to tie up the active runway while the ppc pilot is busy getting out of his/her machine to wrap up the main chute. This is exactly why we need a certificate for ultralight pilots ONLY that would allow us into airports under certain conditions. Many ultralight pilots have been performing their own work on these planes for a long time. If they are required to spend a lot more for a 16 hour training course (which may include travel expenses), many of them will not opt to get the SP certificate. Ultralight flying will be too costly and they will get out of the sport. I believe many of us want to be licensed without a lot of cost and regulation. This is why Part 103 has served us well over the years. All that was needed to be done with the "ultralight problem" was to offer a written exam, checkride (for existing pilots), increase the empty weight limit to 500 lbs, single seat only, and make some modifications to the training exemption. This is all we want. We have no desire to mix with larger aircraft at airports unless we are welcomed. The majority of us fly out of private strips and/or hay fields and stay out of traffic. This is the way it should be for these little planes.

Comment NO: 555	User Name: 584241

We must find a way to keep the L*A*W*Y*E*R*S out of this program. There are no "deep pockets" in this industry. A lawsuit will mean bankruptcy and no more factory support!

Comment NO: 561	User Name: William G. macIntyre

The Sport Pilot NPRM is overly complex and cumbersome. Simply remove the medical exam requirement for non-commercial day VFR flight in two place piston driven non-tubocharged aircraft weighing less than 1700 pounds. This would, in a penstroke, enhance general aviation sales and flight activity , support current US(vs. foreign) light plane and engine manufacturers, and retain the current maintainance and licencing regulations for consideration of possible change at a later date. The NPRM trys to do too much at once.

Comment NO: 562	User Name: Steve

I think as a whole the proposal to be a great restart for general aviation. There are more and more airports closing all the time in our smaller towns and citys. They can all benifit from this proposal. Without compromising safety. It is back to the basics, and many of these pilots will move on up the ladder as in the past.

Comment NO: 595	User Name: glaunt

There will most certainly be a thousand issues regarding the consensus standards for manufacturing to be resolved. it would be easy to adopt an existing foreign airworthiness std..but that would be way to easy...it is these issues that will be most difficult. One thing that caught my eye was: 21.186 Issue of Special Airworthiness Cert. Light sport Aircraft item (5).....pilot training manual... I dont think Manufctrs should be resposnible for Flight training...seems unprecedented in cfr's.. (does piper of beech provide that?)..and unique flight characteristics could be covered in the required POH.(ie...high thrust lines, shallow departure angles, limited x-wind capabilities, etc.)

Comment NO: 601	User Name: goluscombe

I feel the FAA has done an admirable job. I think history will look back on this proposal as providing a great impetus to an industry that has suffered from attacks on many fronts, most outside of the purview and control of the FAA. Thanks guys, for expanding our personal liberties and being partners in preserving the future of recreational flying.

Comment NO: 604	User Name: Triplek45

I believe the U.S. taxpayers would have been better served by: 1- Changing Rec.Pilot to DL medical. 2- Bringing Part 103 limits up to meet the Safety level that the aircraft (vehicle) are being produced at.

Comment NO: 605	User Name: sthomason

The FAA ought to reconsider the weight requirements. My old Cessna 140 cruises around 100 knots (frequently less), and would definately fall within the speed requirements AND the kinetic energy requirements, but would somehow be disallowed due to its "high" gross weight of 1450 lbs. Older designs using more robust engines (O-235,O-200,C-85, etc) would be equally safe, equally easy to fly, and the designs are well-proven. These aircraft are not IFR and are generally flown by people that just love to fly and have only occasional trips over 100 miles - perfect for Sport-pilot. The designs are VERY simple, and the maintenance is VERY straightforward. I for one would not like to exchange safety for lighter weight. I propose we extend the gross weight limit to 1500 lbs.

Comment NO: 628	User Name: Dennis Estenson

PA-18 Super Cubs are what most "sportsmen" use in Alaska.If there is a limit on gross weight, it should be set high enough so PA-18's qualify.

Comment NO: 629	User Name: stewart

1. Eliminate the third class medical requirement for Private Pilot and /or Recreational Pilot categories. 2. Increase the weight limits for the Part 103 guys to make them safer, and eleiminating corner cutting. 3.Allow pilots who have recieved mechanic training to do their own maintence in Private/Recreational/sport categories. 4. Do not make "Certified engines" a requirement in sport rules.

Comment NO: 630	User Name: stewart

1. Eliminate the third class medical requirement for Private Pilot and /or Recreational Pilot categories. 2. Increase the weight limits for the Part 103 guys to make them safer, and eleiminating corner cutting. 3.Allow pilots who have recieved mechanic training to do their own maintence in Private/Recreational/sport categories. 4. Do not make "Certified engines" a requirement in sport rules.

Comment NO: 671	User Name: capella1

The FAA should not consider expanding the applicability specifications of a Light Sport Aircraft to include heavier or faster aircraft than currently proposed. To do so would require more complex training and consensus standard of airworthiness programs for LSA. More complexity is not needed for Sport Pilot and existing Rec/Private Pilots do not need the Sport Pilot training program to operate aircraft certificated in the standard category. Should the FAA wish to allow the operation of heavier GA aircraft by pilots without a class 3 medical, they should consider exempting rec/private pilots from the medical requirement when operating these heavier two-seat aircraft in day VFR conditions. Keep Sport Pilot simple and inexpensive!

Comment NO: 702	User Name: mccoy3

None

Comment NO: 717	User Name: Steve

Thank you to the FAA, This is long overdue. and will help GA in all sorts of ways. As a small airport owner operator, I see first hand the state of GA. Small airports are closeing every day. As a privatly owned / public use airport in the business for 75 years, I do know something about which I speak. This is not the answer to all of the problems, but is a help. Thanks again.

Comment NO: 753	User Name: flyfree

Powered Parachute required flight time SHOULD NOT be reduced to 10 hours (from the existing 25 hrs) for the Sport Pilot rating, as the EAA has suggested. In the past ten years, those wanting to take a passenger up (student) were supposed to fly 25 hours solo before they could get their BFI ratings. Most actually only flew 10-12 hours and were just "signed off" by the guy who sold him the powered parachute. If the regs are reduced to only 10 hours required, some will have their neighbors do the flying! Don't cave in to what the PPC manufacturers want. 10 hours is nuts!

Comment NO: 765	User Name: towpilot

Aero towing hang gliders. This activity has opened up vast possibilities for the conduct of the sport in places where soaring conditions are excellent but there is no high ground from which to foot launch. Being able to take advantage of these conditions materially improves the overall quality of hang glider pilots because of the long cross-country potential such areas offer. This aero towing activity is now several years old and has compiled an excellent safety record. The FAA, on page 5375 of the proposed rule states a "belief" that pilots towing objects should have a higher level of experience and training than the sport pilot certificate allows." As a 5400 hour Commercial pilot with a glider rating and a CFI in gliders, some 12,000 aero tows as PIC of a tug and some 8000 tows as PIC of a glider being towed, plus an Advanced hang glider rating with an aero tow sign off, I must question whatever reason the FAA has for holding this specious "belief". I have trained tow pilots and have written a tow pilot manual for my own operation. I can state catagorically that aero towing is a critical operation BUT IT IS NOT ROCKET SCIENCE! In my experience any conciencious pilot with 100 hrs or so of PIC time can be taught to aero tow gliders or hang gliders safely. The excellent safety record compiled so far has been accomplished by hang glider pilots with little formal powered aircraft training. Because they are trained in ultralight sport aircraft they would, in my opinion, be much superior from a safety standpoint to a Private pilot with 100 hrs of PIC who has to transition to a sport aircraft to learn to tow. The provisions of 14 CFR part 61 Para. 61.69 as well as 14 CFR Part 91 Para. 91.309 transfer quite readily to the sport pilot rule and would cover this growing aero towing activity. The proposed rule has taken years of hard work to get this far. What a shame not to carry it a bit farther and cover aero towing of hang gliders. Hang glider towing needs a body of written regulations it can turn to for guidance rather than an extention of the current regualtory limbo in which it now resides where the activity is prohibited on the one hand and then allowed by fiat on the other.

Comment NO: 782	User Name: dmogk

I believe that the gross weight limitation of heavier-than-air aircraft vs. lighter than air aircravt should be re-thought. I think that the gross weight limitation should be powered aircraft vs. unpowered aircraft (a la Part 103). My specific case-in-point concerns gliders (unpowered aircraft) and airships (powered aircraft): Gliders are basically an airframe, one or two people on board and some water ballast. Airships are much more physically complex and the components are more massive - Envelope including ballonets, catenary curtains, nose/mooring cone, and tail fins PLUS the gondola - one or two people, an engine, fuel, and water ballast. I believe that the 560 kg limit should be for all powered aircraft and the 300 kg limit should be for all unpowered aircraft. I also believe that the gross weight should be quoted in strictly SI units, therefore the mass of the lifting gas of a lighter-than-aircraft would be included in the gross weight of the aircraft and some confusion would be eliminated. Dale Mogk (dmogk@earthlink.net)

Comment NO: 785	User Name: Dideus

The maximum gross weight should be increased to include the entire spectrum of 7 series champs. Not only the 7AC, but the 7BD, DC, and CCM.

Comment NO: 786	User Name: Wayne McIntosh

I truly hope the Sport Pilot NPRM becomes the new flying sport sensation of the USA. I understand that the FAA has worked hard and consulted with the pilots and airplane owners and aviation orginizations. My worry is that the NPRM as written will drive the ultralight flight instructors out of business. Think about it the General Aviation new aircraft market for 4 seat or less piston engine aircraft has almost died. Most small airport FBO's use older aircraft as training and rental aircraft. With Sport Pilot there will not be any older aircraft for 5 or 10 years after the first new LSA is sold. Yes, there will probably be some flight schools in larger metro areas that buy new aircraft for trainers but most of the airports in the USA that sport aviation uses are not in metropolitan areas. I think we need to allow Light Sport CFI's to use Experimental aircraft as trainers for a peroid of time long enough to assure a pool of good used aircraft for trainers. The FAA and others envision Sport Pilot as a stepping stone to higher ratings. This may be so for some but I think not for most people. I think SP will be mostly Experimental Ametuer built aircraft in the forseeable future. It looks to me that a ready to fly LSA will cost in the $35,000.00 to $60,000.00 range and anyone who can afford that cost will also be able to afford $4,000.00 to $6,000.00 for PPL flight instruction. If you can afford the PPL instruction and can afford a new sport plane the same money will buy you a nicer used GA aircraft. So I think the majority of Sport Pilot certificate holders will fly experimental, or older certified aircraft.

Comment NO: 808	User Name: Riggs

The sport pilot gross weight should be raised to 1650 lbs. Recreational pilot privileges should require a drivers license or a 3rd class medical certificate.

Comment NO: 840	User Name: gkrug

Present Gross Weight will exclude many good, stable, safe aircraft which have heavier engines and airframes. Some of the earlier aircraft were under-powered based upon engine selection at the time. I suggest that Any EAA suggestions be given serious consideration. There are many existing aircraft available that exceed the presently proposed restriction. This is the type of aircraft in which I learned to fly back in the 50's and the type that I am interested in.

Comment NO: 861	User Name: lloydhan

I believe that the gross weight limitations should be increased, at least for the initial instruction period, to include the aircraft that proliferate in the flight schools through the nation. There is a dearth of available aircraft that meet the gross weight limitations but which might meet the other criteria for light-sport aircraft. Without such temporary increase the availability of instructors who qualify and of aircraft in which to train might be very difficult to find. A temporary (or permanent) increase in gross weight might be in order.

Comment NO: 868	User Name: David Hodgson

If you build an experimental light sport aircraft yourself do you still need athe 16 hour course sec. 91.409? Building light sport aircraft kits will problably be the only way most of us will be able to afford one. Towing a slow glider i.e. hangglider or ultralight glider I feel would best be accomplished with a slow aircraft i.e. ultralights.

Comment NO: 908	User Name: tbrandt

For the Glider Sport Pilot the altitude limitation of 10000 feet msl can be a constraint to the recreational use of the glider. Consideration should be given to an endorsement for the glider pilot (similar to those for operations in B, C, or D airspace) to operate above 10000 feet.

Comment NO: 941	User Name: Charles Dearborn

Recommend that the gross weight restriction be set at one ton. 2,000 pounds gross weight yields considerable flexibility in designing a sport aviation category aircraft.

Comment NO: 944	User Name: Flyguy

I would like to see the gross weight limit increased to accommodate the new two-stroke diesels that are coming on the market soon. They are a little heavy but well worth using because of their fuel efficiency, reliable power, less expensive fuel, and lower emissions, and lower cost. I'd like to

see variable pitch or constant speed propellers permitted as well. Avoid certification issues by letting aircraft and engine manufacturers set their own standards of excellence because the market will vote with their dollars and the industry knows that very well. Overall, this is a very exciting proposal and I look forward eagerly to it's improvement and implementation.

Comment NO: 946	**User Name: Terry Davis**

I feel that the aircraft gross weight under this rule should be raised to 1500 lbs to allow more of the older 2 place light planes to qualify. A very small increase would allow many more almost identical aircraft to fit under the rule. The more planes flying, the more popular Sport pilot will be and the less likely to become a bad joke like the Recreational pilot license.

Comment NO: 977	**User Name: dfreeman**

I believe that this proposed ruling has done nothing to address the future of training for non-rated and inexperienced ultra-light owners. If anything, losing the current exemptions will probably raise the costs and lower the training experience level for new Part 103 operators. I guess it will ultimately depend upon the “consensus standard”, how high and at what cost the bar is raised for the players. I believe the ultimate success of this proposal will be attained by starting out conservatively with restrictions and then adding to them as necessary where valid safety measures will result in real measured safety gains. I don’t think you can write the “rules” to cover all potential circumstances without first finding out who the players are and what the game is. I would like to see the drivers license in lieu of medical incorporated for the Recreational as well as Private certificates for VFR flight. I believe that the gross weight limit should be raised to include popular vintage aircraft (Cessnas, Pipers etc.) and current trainers. I don't believe the max cruise speed should be included. As long as the current proposed max stall speeds are in effect and the aircraft is non-complex and under 200 horse power. I am looking forward to a sensible, but not exclusionary ruling that will realize the goals outlined in the NPRM summary “to provide for the manufacture of safe and economical aircraft and to allow operation of these aircraft by the public in a safe manner”.

Comment NO: 979	**User Name: sporty140**

I feel that the aircraft gross weight limit of 1230# is set too low. It should be raised so as to include more of the 2 place FAA-certified 85 to 100 HP trainers. An increase to 1500# or 1650# for example. If the kinetic energy requirment necesitates holding to the 1230# limit, then use a maximum take-off weight of 1230# which would still allow many of these aircraft, if flown solo or with less fuel, etc on shorter recreational flights at the discretion of the recreational pilot.

Comment NO: 997	**User Name: Ultraliteteacher**

The NPRM does not address where the needed Designated Pilot Examiners will come from. Magically appearing will be 200 of the DPE's and they are to test 192 instructors and 1714 pilots within the first year. These numbers are according to the NPRM. The need will be higher. ASC alone has over 2300 instructors that all have a need for either SP or SPI training. There will certainly be more Part 103 pilots as well as private pilots whom all will want cross-over training. With the DPE's requiring the FAA training course, it is very unlikely that the 200 DPE's will be found. To make matters worse, there is likely to be a higher need for them than the NPRM dictates. This lack of foresight, coupled with the loss of the exemptions will traumatize the existing training structures for Part 103 pilots as well as for future instructors. There must be a sensible way to add to the DPE forces for SP and SPI. I propose that all FAA CFI's that are UL BFI's only need to complete DPE registration forms for approval in all DPE activities for SP and SPI. These candidates have the knowledge of FAA regulated instruction as well as a proper understanding of SP and UL flight requirements. This would more than double the base of DPE's as resources to the FAA.

Comment NO: 1012	**User Name: bampbs**

If it were possible to increase the weight and speed limits to include all the Cessna 150s and 152s out there for rent, Sport Pilot would take off like a shot. Perhaps just a training exemption would be adequate so that one could obtain a Sport Pilot licence in these aircraft. There isn't much difference in flying them and a 1200lb, high-wing, nose-wheel two seater.

Comment NO: 1049	User Name: RFI

I know limits have to be set somewhere but a slightly higher gross weight would allow inclusion of a number of light two place aircraft and a few more gyroplanes. I have designed and manufactured two and three place gyroplanes and a two place fully enclosed version powered by current production Subaru engine conversions is pushing the limit due to the high power needed for safe flight. Gyroplanes have a very low L/D ratio on the order of 4 or 5 to 1 at best which requires much more power to fly than a fixed wing aircraft. One of the most popular and largest number presently manufactured gyroplanes is the Canadian RAF 2000 which has an allowable gross weight of 1550 lbs. with the Subaru EJ22 engine. The empty weight of that ship is typically 750-800 lbs. which doesn't allow sufficient payload for two of today's average sized people (no longer 170 lbs.). Second, is there any reason why an aircraft/gyroplane could not be included in the NPRM if it was operated at the 1230 lb. gross weight even though it was specified for a higher gross weight? Recreational pilots are allowed to fly four place aircraft even though they are not allowed to carry only one passenger. It seems that a number of two place aircraft that exceed the 1230 pounds gross weight fully loaded could be operated solo or with two lightweight people and stay within the sport plane limit.

Comment NO: 1067	User Name: chuter

I think the max altitude should be raised to 3000 AGL. The issue of future training after the exemptions have expired seems to indicate it will be more difficult and expensive to get training.

Comment NO: 1103	User Name: Flymo

IF Gyroplanes _are_ included, they will need some (not much) special consideration due to the ways that they differ from fixed wing 'planes. That they receive this consideration is of particular importance at this time, since it is clear that one result of the CarterCopter and Groen Brothers Aviation initiatives (as well as the UK SuperGyro project) may well be a substantial increase in Sport Gyros. No guarantees, but it would be both unsafe and embarrassing if the administration were to have arguably marginalised the sport gyro movement at a time when the Gyro comes of age - the theoretical basis for CarterCopter derivatives exceeding the performance of both existing rotorcraft and GA fixed wing aircraft is sound. Well, NASA seems to think so. Some gross weight flexibility due to the typical gyro L/D is an example of this consideration. The max altitude increase point made below is also valid in my view.

Comment NO: 1106	User Name: bruce2

After reading most all the posts here I have to agree with what I have read 1 raise the weight to include most of the 2 seat classics I E champs luscombe colts etc 2 find the HP rating of these classic units like colts with 105 hp etc and use those units to model the restrictions Like one writer below stated, two seaters aprox 100 hp with the weight restrictions limiting the fuel/baggage/passanger load

Comment NO: 1127	User Name: fatplane

You know, the FAA is letting itself in for a lot of grief by microregulating everything in the fat ultralight category. A lot of changes have happened since the early '80's, when 103 was written. Engines in use today are much heavier, about 50 pounds or so. The engine mounting structure in the airplane also had to increase to accommodate the heavier engine. Wheel brakes have been incorporated also, which is a VERY important safety item for flying off hard surfaces (including hand propping the engine). We also no longer have to put up with "foot-launched" aircraft, like we did in the old days, so you have to add some weight for the landing gear. I think, if you could just increase the empty weight up to around 335 pounds, everyone would be happy. Why not? Its a very safe sport today. If you let the weight go up to 335, then speed should not be an issue, because higher horsepower engines will not make the weight limit.

Comment NO: 1157	User Name: 21214

You can't get rid of current training exemptions for gyroplanes or ultralights. There are too few instructors now, and all the majority of the sport aircraft rules will do is make even fewer instructors. Most gyroplane students must travel hundreds, of not thousands of miles to find an instructor now. Let's not make it even worse!

Comment NO: 1205	User Name: jonvee

Please do not exclude Gyroplanes in any way. It is hard enough to get the needed training for safe flight. Please take a small amount of your time and communicate with the Popular Rotorcraft Association. They have the answers you need.

Comment NO: 1248	User Name: helitim

No further comment.

Comment NO: 1251	User Name: PWPlack

No. This is already a "fat" NPRM.

Comment NO: 1258	User Name: Dugaru

The Cessna 150 and 152 should qualify as Light-Sport Aircraft, for training purposes at least. This would allow a number of existing flight schools to start training sport pilots immediately.

Comment NO: 1302	User Name: DartHere

How will Sport Pilot Hours Count towards Private Pilot? I'm confused about why I can't get a Private Pilots Certificate to fly a weight shift aircraft? If you noticed I called it an AIRCRAFT, as this would be the only term that would fit using the English language. In the NPRM it states that the hours as a Sport Pilot can count toward my private pilot's certificate, but then I find that I will have to learn to fly 3 axis and test in and about 3 axis to get my Private Pilots. No one will care that I am not going to fly a 3 axes, or will they care that I may not have enough training to fly a weight shift aircraft. I think it is time that someone over at the FAA explains what is going to be done to make it possible for people to get their Private Pilot in a weight shift aircraft. Weight Shift aircraft have been around for a long time, and to ignore them is not fair or reasonable.

Comment NO: 1304	User Name: fatplane

The costs incurred by sportplane manufacturers in the development of these "certificated aircraft" will be so prohibitive that buyers will refuse to pay the price. The cost of the Quicksilver GT500 just about doubled. Remember, the ultralight category, and more recently the fat ultralights, were originally developed to produce a low-cost solution to the poor man's desire to fly. Of course, the ranks will thin out somewhat initially when the 'mom and pop' operations are forced out of business, in spite of the fact that most of them have solid, well-designed products. Are you getting them involved in the consensus standards process? Are you getting them low cost financing to support them during the transition?

Comment NO: 1321	User Name: tebrahim

when I register my fat ultralight as a light sport experimental(which I bought used,already complete),I assume I have to take a 16 hour course which allows me to maintain & do annnual inspection conditions,has the FAA already polled all the dozens of SMALL manufacturers to see if they will all hold these classes,what if tne kit manufacturer is now out of business. The A&P's in my area are not too keen on doing 'annuals' on ultralight type aircraft,especially the ones with a lawn mower engine,as one A&P put it.

Comment NO: 1340	User Name: RTHOMPSON

1. Increase the weigth limit , specificly for tricycle geared planes, to at least 1700lb gross. It is at least AS safe to operate a Cessna 150 as a Piper Cub, both for the pilot and the general population on the ground. 2. Allow an owner to maintain and inspect his/her own aircraft, even existing certified.

Comment NO: 1343	User Name: jbrennan

I believe that the Cessna 150 & 152 should be included. It is only a slight increase in the maximum values proposed. The Cessna 150 & 152 have, statistically, the best aggrate safety records in the GA fleet (The Cessna 150 and 152, Bill Clarke, 1987, Tab Books; also The Aviation Consumer Used Aircraft Guide, Richard B. Weeghman, ed., 1985, Belvoir Publications; Weeghman cites "an NTSB study found the Cessna 150 series with the lowest fatal accident rate - at 1.35 per 100,000 flight yours - of any two seater, and the lowest fatal crash rates of ANY single-engine aircraft, period.") Further, the Cessna 150 & 152 tend to be well equipped (e.g. radios, transponder, etc.). Finally, they were (perhaps) the most widely produced aircraft and so are relative economical to purchase and maintain, especially in comparison with a brand new factory built 1200 lb. aircraft with virtually no safety "track record". Thank you for your consideration.

Comment NO: 1347	User Name: jbrennan

Lose the 3rd Class Med. Cert. requirement for Recreation and PRIVATE pilots (driver's licence instead). It is only a matter of time. See McClennan's comprehensive analysis of this question in the Nov. 2000 issue of Flying Magazine.

Comment NO: 1354	User Name: GeraldEmery

After reading the comments that were previously written about the NPRM, I must agree with the people out there that feel that the speed limits are reasonable and that weight limits are the major drawback to this NPRM. I think that all aircraft that fall into the speed restrictions should be allowed regardless of the gross weight.

Comment NO: 1366	User Name: knight starr

no thanks

Comment NO: 1399	User Name: dschach

Ultralight flight time counts towards the sport pilot certificate but it does not count towards higher certificates. Ultralight flight time that is documented by one of the national organizations should count towards higher certificates. There are 5000 hr ultralight flight instructors that will become 0 hr sport pilots and sport pilot instructors. CFI's can become sport pilot instructors with little training. This is unfair to ultralight flight instructors.

Comment NO: 1401	User Name: dschach

The sport pilot proposal does not address tandem hang glider instruction nor hang glider towing. Tandem hang gliding is necessary for safe hang gliding instruction. Towing is a proven and safe method of launch. Please allow light sport aircraft to tow hang gliders.

Comment NO: 1402	User Name: potentialpilot

I believe that there are some unnecessary restrictions in the current iteration of the NPRM. For instance, why restrict the aircraft to one engine? There are designs out there now, and yet to be created, in which two (or more) engines may be used, which would not be significantly more complex than a single bigger engine. What about a blimp-type vehicle that needs 3 motors to accomplish steering control? Or an ultralight-type aircraft using two large model airplane engines, or perhaps even a couple of the very reliable and simple tiny jet turbines available? It's been done already (a Jet-powered CriCri has flown for example) and within the bounds of the speed and weight limits, why micro-manage the aircraft designs like this? The same applies to the retractable gear restriction. The Arnet-Pereyra Aventura II seaplane has a VERY simple repositionable gear, and in fact I've seen one where the pilot forgot to lower it before landing on pavement. The aircraft damage was more cosmetic than anything. It would be just as easily for a pilot of an amphibian with "repositionable" gear to forget to raise it while landing on water, with likely worse results. I understand that having retractable gear is one more thing to go wrong, but just like lowering flaps and checking for traffic, this comes down to common sense and attention to flying skill. Again, don't micro-manage the design itself... set parameters to manage the total momentum of the airframe instead. The list of potential features that some feel should be

restricted could go on and on... variable props, speed brakes, spoilers, variable-geometry designs, etc. When there are enough aircraft out there with a type of feature that needs special training, then add an official category for that feature and require an "ala carte" approach. A designated feature requiring special training (like retractable/repositionable gear) would only require a logbook endorsement for the pilot to legally use it. This would be simple, safe, and hopefully not terribly inconvenient to the pilot. It would also not unfairly restrict the development of ideas that would improve the quality and capabilities of sport aircraft. Restricting flight priveleges based on make and model is way too restrictive. If something is so different in a particular model of plane that it requires special training, then that feature should be listed as a special item requiring endorsement. But why should one have to go through a hassle to get signed off to switch from a Zodiac to a Sonex? That's nuts! you can jump from a 150 to a Pitts Special legally with no extra training or reviews, so why penalize Sport Pilots? If it's a new plane to you, you ought to familiarize yourself with it first no matter what it is, and find out if there's anything unusual with it. But common sense should prevail too. This requirement is well-intended but neither practical nor necessary, and might end up placing an undue burden on pilots as they try out similar aircraft. I think the speed and weight limit should be raised at least a little bit, especially since there are quite a few popular planes that by all rights should be included (Ercoupes, etc.) that are just a hair over the weight limit. I also think that 130mph is a better absolute speed limit. The altitude restrictions are silly. Gliders often go very high, and 99.5% of sport or recreational airplanes will nearly always be operated below 6000 feet anyway. If you want to go higher, so long as you comply with the rest of the FARs, then why not? You could easily make flight over 10,000 feet permissible with a logbook endorsement, again this fulfills the safety goals and is available to anyone who really is interested in that kind of thing.

Comment NO: 1403	**User Name: dschach**

SFAR 89.75 prohibits sport pilots from demonstrating aircraft to a buyer if the pilot is a salesman. 89.75 states that the pilot must be a private pilot. Given that there aren't any private pilot weight shift pilots. The effect of this rule is to prohibit any flight demonstrations of weight shift aircraft until there are. Also given the 100nm night cross country flight requirement of a private pilot weight shift, I seriously doubt there will be any private pilot weight shift. Please make the night cross country flight optional for private pilots.

Comment NO: 1440	**User Name: buster**

I would like to suggest that pilots currently holding a CFI certificate should not be required to obtain a sign off or 5hrs PIC time in the make and model sportplane in which they wish to give flight instruction. The success of this Sportpilot Rule will depend on an adequate supply of instructors being available early on. Since CFI's do not presently have to observe such a requirement, and can instruct in such a wide variety of aircraft,why would this sign-off requirement be needed?

Comment NO: 1484	**User Name: tuna**

Powered Parachutes are a limited aircraft with a VERY limited speed and very limited RANGE. By far they are used mostly for recreational flying. The required time for training should be limited to 10 hours rather than the 20 hours that I understand is being proposed. This gives someone enough training to fly safely and is by far greater than is being required with many BFI's who are instructing. Additionally I believe powered parachutes should be limited in terms of the airports they can fly out of. Sharing airspace with general aviation planes may be difficult and possibly unsafe due to such low airspeeds involved. I am not advocating limiting ppcs to no airports. I am in favor of airports that have limited usage where traffic is not a major concern.

Comment NO: 1487	User Name: sleepy

Simply SIMPLIFY! That is one of the wonderful things about Part 103. If you would simply add a little more weight...bring it up to par with the slightly heavier, safer craft that we fly now. Address the two seat for receational flying. I think more of the people flying unregistered two seaters would sign on and fly safer if they didn't have to play the "intro flight" game. EEA and ASC should be able to deal with a lot of the issues Sport Pilot is trying to address. Thanks for the opportunity to offer an opinion!

Comment NO: 1488	User Name: Ultraliteteacher

I feel that the make/model wording is a problem not only for the aircraft, but also for the 16 and 80 hour courses. Suppose the case where I get a LSP with a Rotax 503 on it, and the motor wears out. I cannot upgrade to the 582 without a lot of grief and may be required to re-do my 16/80 hour course for no good reason. This situation can be resolved by having the SP-AI courses also be category/class and not make/model based. If the FAA still considers cat/class unreasonable, then go with make (not model) as the differences within one make are minimal. This applies to both the parts and the flying characteristics.

Comment NO: 1489	User Name: Ultraliteteacher

The top speed and weight limits appear arbitrary and not based upon any known science. The low speed is sensible due to its effect upon landing speed. The only apparent reason for the top speed and weight limits would be impact force. This is a relationship of BOTH top speed and weight. Using the NPRM numbers of 1232# and 115kts, the impact equation should be 141,680 'knot-pounds' where a slower aircraft could weigh more while the faster aircraft must weigh less to cause a similar crater. In reality, the top speed limit is still senseless because terminal velocity after breakup during a freefall - times weight - will be what determines the size of the crater, not top speed in ~controlled~ flight.

Comment NO: 1490	User Name: Iflysmodel

Lets remember the older pilots; There are many who have lost their medical or are worried they may do so soon. If we increase the gross weight to say 750kg, then all the 2 place trainers will be included. All of us old guys can fly the type aircraft we learned to fly in. We need to raise the low speed limit to about 55 kts, so all of these two place aircraft that fly at less than 115 kts will be included.

Comment NO: 1494	User Name: Swocolt

In 1993, I had a mild heart attack, in 1994 after a mountain of paperwork and considerable expense I was able to get my medical back. Since all of my flying is recreational I cannot justify the expense every year. The gross weight restricts me from being able to legally fly the very airplane I learned to fly in.

Comment NO: 1499	User Name: Ultraliteteacher

Mommy, where do DAR's and DPE's come from? And no, 'go ask your father' is not the correct answer.

Comment NO: 1503	User Name: Ultraliteteacher

It would be good for the FAA to explain the reasoning behind the removal of exemptions on an arbitrary date. From my view, it can only be to force unwilling participants into the SPI rating. If SPI was superior to 'status quo' then the migration would happen naturally with no need to terminate the exemption, as it would die from lack of participation. If SPI is inferior to 'status quo' then SPI needs fixing. From what little evidence there is that can be gathered, on a 'per takeoff' basis, the ~underregulated~ UL community (straight, fat, & trainers) have a safety record equivalent to or superior to that of GA aircraft. The addition of all these helpful rules (that GA already go by) does not hold promise of increasing our safety record, since those that go by them already are not safer than we UL'ers. Why would the FAA consider removing an exemption with a proven 20 year track record before knowing a successful alternative is in place? Given safety is

the paramount mission for the FAA, imposing rules that compel UL instructors to choose between spending double the money or stop teaching does not satisfy the safety premise of the FAA. The UL instruction is one of the few businesses in the US where the goal is to lose as little money as possible, and where profit is a dream. Only those who can afford to teach will do so.

Comment NO: 1506	**User Name: jbrennan**

I had previously commented that the Cessna 150 & 152 should be added owing to safety, availability, equipment often installed and relatively reasonable cost. I should have added that, with respect to safety, a great many of the designs that would meet the current proposal are taildraggers which are generally considered more prone to accidents than the trike (e.g. C-150/152). Safety should be a prime consideration and slightly adjusting (increasing) the weight and performance specifications will vastly improve overall safety as well as greatly broaden the availability of aircraft to potential Sport Pilots by adding a very large number of existing small two place tricycle gear aircraft.

Comment NO: 1510	**User Name: divad**

I want to thank all who had a part in this rule making process. I want to encourage you collectively as rule makers to continue this momentous work regardless of all the negative comments that you may be recieving. You just can't write a rule that pleases everyone. Fact is, this is a great leap for what most consider a hopelessly gridlocked government agency. Thanks for restoring some faith in our system.

Comment NO: 1527	**User Name: bjmoore**

Ooooh, boy! Where to start? The NPRM contains requirements to which I could never concur. I must first state that there are two principal aspects that I take serious issue with, and therefore am not a supporter of this rule, but stand in firm opposition. These are listed as 1 and 2 below, followed by additional concerns. 1. The loss of the training base for part 103. I would request the FAA consider allowing ultralight organizations to continue to administer the BFI program to provide compensated training to part 103 pilots. BFI's would also have to at least become certificated as sport pilots, as well as registering their former ultralight trainers as experimental LSA. I also believe that the flying public should be given a choice as to whether training is desired in a "special" LSA, versus and "experimental" LSA in order to obtain their Sport Pilot license as long as the differences can be explained (and required) by the instructors prior to instruction being given. Therefore, if the student is targeting flight in an experimental aircraft (which over 90% will be according to the FAA's own estimate) then training should be allowed in experimental craft. 2. Make and Model. The make and model issue is unworkable. It inflicts cumbersome requirements and limitations on the availability of instruction, healthy commerce within the LSA industry, as well as repairman certification, and almost all other aspects of the rule. This feature must be entirely eliminated, or modified similarly to what is proposed in my response to question 4. 3. Altitude Limitations. A hang glider pilot can fly as high as his kite will take him. A BFI can take himself and his ultralight trainer will take him. A 20 hour glider pilot can take it up as high as the updraft will take him. A properly papered and equipped skydiver can jump out and act like B52 cargo from 20k feet. An untrained 103 pilot flying a quicksilver MX can climb as high as his machine will propel him. However, a Sport Pilot, thusly educated and certificated will only be allowed to take the same ultralight vehicle (now an-numbered LSA) to 10k feet + 2k feet AGL. Additionally, a Rec Pilot, thusly educated can only take an n-numbered experimental ultralight style aircraft to 10k feet + 2k feet AGL. A private pilot flying at the same ultralight vehicle, (N-numbered amateur built experimental) can fly this same machine to 18K feet? It's the same plane! It has the same flying characteristics. The training requirement for a SP instructor will be nearly the same as a private pilot certificate. Yet the private pilot will be allowed to cross over mountains at a safer altitude than the sport pilot or recreation pilot. This is an unsafe rule. Why does the FAA want to limit the safety of sport pilots and rec pilots by only letting them cross rugged mountainous terrain at only 2,000 feet of clearance where the mountain range is at 8,000 feet or higher? There is a fact we back country mountain pilots know well, it is that the higher you cross these mountains the smoother and safer the air. Anyone who has been caught in one of those wicked mountain downdrafts, just one time, will understand why I am taking issue with this

unsafe rule. The “word” from the EAA says that the FAA’s justification for this rule is that it doesn't want an unacceptable mix of fast planes and slow planes flying at these heights. Then why do we allow the mix to occur at lower elevations? This is an inconsistent rule. It is an unsafe rule. While the FAA is in the rule-making mode, consider eliminating this altitude limitation altogether for rec pilot and the new sport pilot certificates. 4. Biannual flight reviews and flight currency. There is simplicity in these flying machines that appears to have been overlooked and does not warrant these two requirements. Realize that many of the vehicles that are to be flown, will not be flown during the winter months because of their open cockpit nature. Due to winter, flight currency will expire for a significant portion of these machines as a feature of their open cockpit design. In requiring flight currency, a situation is created that may influence or force a pilot who really doesn’t want to fly in winter conditions to venture out into the cold winter air. This may result in an unsafe situation. Realize also that there is a lack of complexity to these machines. The FAA states in the NPRM “requirements for persons acting as pilot in command are minimum standards that should apply to all certificated pilots. We do not find any benefit to making this requirement less restrictive.“ This is inadequate justification for the imposition of this requirement on these machines that are much more simple than traditional certificated aircraft. Therefore the simplicity of this level of flight is justification not to impose this requirement on light sport aviation. 5. Cumbersome Transition. Prior to publication of the NPRM it was touted that ultralight trainers registered and operated as such, as well as all registered ultralight pilots and their aircraft would be “grandfathered” in. Sounds simple right? However, my understanding of the process is that the requirements shall be much more cumbersome than simple “grandfathering” of these airmen and their aircraft, especially during the inception of the rule. There should be true grandfathering provided for pilots registered with FAA authorized ultralight programs. This should be a blanket authorization, where once a pilot has n-numbered his aircraft, the pilot shows the correct notarized copy of his membership listing his training and ability, he should be directly issued full privileges to operate as a sport pilot. He should be issued both the airworthiness certificate as an experimental LSA, his 16-hour repairman certificate, sport pilot certificate, and, if an instructor, his sport pilot instructor certificate. This will provide an initial inrush of a training base and participation within this rule. These pilots are flying, maintaining, and instructing safely now. This fact is downplayed in the cumbersome process that the FAA is proposing for transition. A true seamless transitioning will eliminate the unnecessary requirements for these existing pilots and instructors listed as follows: a. Have to wait for an available instructor. b. Have to obtain SP student status. c. Have to have DAR inspection d. Have to pass practical exam waiting for an available DPE/ASI. e. Have to pass written exam f. Have to have CFI verify exam g. Have to pass 16-hour course in order to do own annual inspections. h. If instructor has to re-take the FOI examination, identical to what was taken to become an ultralight instructor. i. Have to wait for an available second instructor to verify training and ability. Zero, nada, not one of these listed 9 requirements is needed for airmen that have already been flying, maintaining, (and instructing in) their aircraft. Please allow an initial conversion of existing pilots and airmen to enter operations under this rule unencumbered with unnecessary hoops to jump through. FAA sponsoring of events where existing pilots and instructors of aircraft already registered with ultralight exemption holders should be allowed to fly-in to an event and walk away with Sport Pilot certificates, inspector repairman ratings, and experimental LSA certificates at the end of the day. Preferential treatment is provided for a very small group of persons known as AFI’s, Advanced Flight Instructors registered with ultralight organizations. I am opposed to blanket certification of these instructors instead of all registered ultralight pilots and BFI’s. There is some cursory language of how AFI’s would become the “first” sport pilot instructors. To this I must vehemently oppose. AFI’s are rare finds at best, and are given by rule an unfair advantage over others desiring to provide Sport Pilot instruction. Blanketing of existing pilots and instructors will provide the training base needed to get sport pilot up and functioning. 6. Justification for this rulemaking is stated within the NPRM that exemptions do not qualify as an acceptable alternative. Several other exemptions are written within the experimental/light sport aviation community that are not addressed. These exemptions are receiving biased treatment by the FAA versus equal discontinuation and incorporation by rulemaking. In addition, it would appear that new exemptions would be needed to comply with the new rule. These would include, but not be limited to: 1. Tandem training

operations in hang gliding operations (USHGA #4271) 2. Towing exemptions for hang gliding operations (USHGA #4144) 3. Exemptions for training in LSA (EAA #7162) 4. Exemption for compensated training for CFI's in experimental (ASC #7390) I am opposed to rulemaking at one time that disallows one type of operation under exemption, justifies the rule by eliminating exemptions, then proceeds to selectively look at these operations in one facet of light sport aviation versus not looking at all of exemptions. Therefore, the requirements for operations in tandem and towing of hang gliding students for the purposes of training and towing should be written as a SFAR for future permanent adoption. I also take exception to the fact that the FAA issues these exemptions for training for compensation in experimental aircraft (especially 7162 and 7390) yet will not allow compensated training for sport pilot instructors nor pilots intending to operate under Part 103. When did these practices become unsafe or safer if operated by differing groups of pilots? There is inconsistency here that demonstrates unfair treatment and over regulation where such is unnecessary and not needed. 7. I have difficulty fathoming the FAA's justification or reasoning behind disallowing a salesperson to demonstrate an aircraft in flight to a prospective buyer. While at the same time, any experimental amateur home-built aircraft or LSA operated by a private pilot, rec pilot, or sport pilot, can be demonstrated in flight for sale. If a salesperson has the correct flight experience and certification to operate an aircraft, this same salesperson should be allowed to demonstrate the aircraft in flight for sale. This requirement makes absolutely no sense, unless the FAA intends to position itself as a roadblock in the path of commerce and the free enterprise system. 8. The NPRM is unclear in the aspect of whether or not a certificated sport pilot will be allowed to operate an aircraft that has a higher gross weight nameplate, if he desires to fly the same aircraft solo, with an actual takeoff weight of less than 1232 lbs. is it the intention of the FAA to allow such? I would be supportive of the allowance of such an operation. I must unequivocally restate, that the proposed regulation is much too ambitious in it's attempt to regulate a variety of aircraft that are too dissimilar in flying characteristics, operational characteristics, and performance range to be fit into a singular rulemaking effort and category. Ultralights by inspection are much too simple in operation and design to have to be regulated as proposed in the NPRM. It does not make sense to propose under the same regulation that a 390 lb (empty weight) trike, powered parachute, or fat ultralight, need to be regulated in this manner. Forcing ultralighters to comply with this rule is analogous to forcing your mother to wear a dress that is too tight, then never letting her take it off. In addition, the loss of affordable compensated training to these pilots will compromise safety, and the viability of continued Part 103 operations. Consider continuation of the BFI program by certificated Sport Pilots and an expansion of Part 103 to 390 lbs and 8 gallons as I have described and justified under my response to question 5. I would appreciate formal response to the items I have raised, how the FAA is addressing these items, and how appropriate rulemaking will be adjusted or formulated to address these concerns.

Comment NO: 1550	**User Name: Bill Bardin**

Yes, and I will be sending in a multi-paged letter with my comments. Overall, it is an unfair law for flyers involved in recreational or instructional ultralight flight. It tries to push them into the general aviation arena, and we don't want to operate heavily in that arena.

Comment NO: 1578	**User Name: ultraj51**

The only issue i think needs help is the kits should be capable of gaining the same airwortheness cirtificate as production types by way of inspection of company or company desegnited reps thanks

Comment NO: 1579	**User Name: llhoedl**

Light-Sport Aircraft policy, I think someone flying under this policy should not be restricted by speed, altitude, or aircraft weight. As long as it is not for hire. And they should not have to suffer through a biannual flight review. I think he BFR was stupid from the get-go and should, be eliminated. I would like to see FUN return to private aviation.

Comment NO: 1582	User Name: dschach

While I applaud the FAA's attempt to promote safety and revitalize general aviation, the Sport Pilot Proposal fails to properly address the issues that prompted the national ultralight organizations to petition the FAA back in 1988. Ultralight pilots fly slow and simple aircraft over uncontested areas. They asked the FAA for modest weight increases to allow for advances in ultralight design over the last 20 years. The ultralight community does not want to fly aircraft with gross weights over 992 lbs nor speeds above 75 kts. With the Sport Pilot Proposal, the FAA proposes aircraft with gross weights up to 1232 lbs and maximum speeds up to 115 kts flying over congested areas. These light sport aircraft have 3 times kinetic energy of the fastest ultralight trainers, 6.6 times the kinetic energy of a high performance weight shift aircraft and 26 times the kinetic energy of a powered parachute. It is clear that the FAA is proposing something far different from what ultralight pilots are flying today. A cursory review of the comments so far show that the majority of the positive comments come from FAA certificated pilots who want to fly existing certified aircraft. Not only do they want to include certified aircraft into the Sport Pilot proposal, but also they propose increasing the gross weight and performance of light sport aircraft even further. It is no wonder because with a gross weight of 1232 lbs, it seems quite arbitrary that a 1300 lb or 1500 lb aircraft should be excluded from this rule. I would like to point out that these pilots are already served by existing regulations. They may already fly these aircraft! Many certificated pilots are attracted to the Sport Pilot proposal because of the driver's license medical. I support the concept of the driver's license medical in place of a 3rd class medical. A recreational pilot may already fly any single engine aircraft with up to 180 hp. The heavier, higher performance certified aircraft being proposed fit more naturally under recreational pilot than under sport pilot. Therefore, along with the other changes to the recreational pilot certificate in the Sport Pilot proposal, the FAA should remove the requirement for a 3rd class medical and replace it with the driver's license medical.

Comment NO: 1613	User Name: davidbauch

FAR 103 should remain indefinitely, with the following modifications: A Increase the weight limit from 254 lbs. To around 450 lbs. This would allow for the use of electric starters, newer and slightly heavier engine designs, safer airframes, better suspensions and tires, stronger wings, and additional electronics. Set a weight limit so that the majority of the two place Ultra Lights could economically be converted to single seaters. B Increase fuel capacity to 10 gallons. Five gallons is unsafe when consuming 3 gallons per hour with the common Rotax 582. C Limit capacity to one occupant, pilot only. Those who wish to take passengers could participate in the Sport Pilot proposal.

Comment NO: 1625	User Name: harveyking

Yes. This proposal is in part from the request to up grade the part FAR 103 reg. Unfortunately this has been left at the wayside in several important areas. The FAA has attempted to address the weight issue of the 254# limit for 103 "vehicles" by creating "LSP" category. The reason for the weight being exceeded has come about because of advances in engine reliability and safer airframe development. No one can deny that the engines of today, are more reliable than the engines of the '80's. The engines used on U/L's today weigh about 90 pounds, 50 pounds more than the engines of the 80's. When installing these engines additional weight of about 25 pounds is incurred in heavier motor mounts, landing gear etc... This equaling about 75 pounds, making today's otherwise compliant "103 vehicles" close to 330 pounds. These changes have not increased performance or range. If the FAA does not wish to raise the weight limit entirely, then I would suggest that a partial weight increase along with exceptions for safety related equipment be adopted. Safety related does not increase performance or range. This would include items as brakes, electric self starter systems, safety harnesses, etc... The original weight limit was based partly on lightweight and slow speed would make it possible for a pilot to self teach themselves. This has been proven too many times to be untrue. Also, thought must be given the inclusion of these aircraft into commercial airspace. These otherwise compliant "103 vehicles" are very slow, 63 mph Maximum. While it has been said that, "multiple speed aircraft can be handled in parallel

patterns", the examples of this are primarily structured events, such as fly-ins. The participants have had recent briefings. The local Controllers are anticipating the situation. I can see an owner having been required to register his otherwise 103 compliant U/L as an ExLSP, strapping on 20 gallons of fuel and heading for a local C Catagory airport. After all, he has paid his Federal and State fees. There are literally thousands of these otherwise compliant 103 U/L's. As he approaches at 30 mph, he is entering the pattern with a student pilot practicing solo touch and go landings at 100 mph. In addition a private pilot with 70 hrs TT, in his recently acquired 310 Cessna is also entering the pattern at 140 mph. The likelihood of tragedies involving this scenario are quite high. Keeping otherwise compliant 103 vehicles in not congested airspace as they now operate will ensure the continuation of the separation that exists today.

Comment NO: 1649	**User Name: live2av8**

YES, although Sport Pilot/Light Sport Aircraft could have the potential of fulfilling a gap at the lower end of general aviation, it has the appearance of simultaneously stifling ultralight class aviation in the meantime. It would appear that most FAA CFI's have no intention of instructing in these lightweight machines (experimental homebuilts, LSA), so ultralight instructors will have to be made CFI's-SP relatively easily to fill the gap. Yet many UL instructors are happy just where they are. I can certainly see the need for something like Sport Pilot or Recreational Lite but there's also a need for regulatory change regarding single and 2-place ultralights, without being included in Sport Pilot. Trying to solve everything with one massive rule isn't going to work. You the FAA seem determined to thrust headlong into directions which won't resolve issues you intended to address in forming the ARAC. You seem determined to listen to the WRONG people regarding ultralight aviation. Paul Poberezny of EAA had been working on the Recreational Pilot's license since the early 80's and wanted ultralights grouped in with it. Then in 89 when you finally released it. Paul Poberezny in an EAA News Release wrote: "We are pleased FAA has issued this rule, I believe the recreational pilot certificate and FAA's proposed Primary Aircraft Category signal the continuing recovery of general and sport aviation in America." That comment seems to rank right up there with these 2 statements: - There is no reason for any individual to have a computer in his home. - Ken Olson, President, Digital Equipment, 1977 and "We don't like their sound, and guitar music is on the way out." - Decca Recording Co. rejecting the Beatles, 1962 Could these people ever be, MORE WRONG. Yet, you the FAA acted upon Poberezny's/EAA's requests, spent millions of tax dollars in the process to obtain a few hundred new Rec. pilots. All along you seem to have ignored USUA's petition for rule change. And instead chose to listen to EAA as to what the "ultralight" movement wants and needs. But EAA has never been an ultralight organization, they didn't have a pilot or vehicle registration program, or offer their training exemption to non-FAA CFI's until RECENTLY, and likely did so reluctantly to gain political clout towards the Sport Pilot initiative in 1997. Had you actually listened and responded to an "ultralight organization" namely USUA, right now there wouldn't be more than a handful of illegal 2-place operators, most would be LEGAL 2-place ultralight pilots without having to be pseudo BFI's, pretending to be instructing. When newbies from the GA world come to the airpark looking to fly a 2-place and I inform them what they have to do in order to fly one for recreational purposes, it's amazing how many times I hear No Thanks, I'm done with all that FAA crap!! The ideology that USUA had petitioned for, seemingly decades ago, made more sense than anything proposed to date. So in closing I'd like to say that you the FAA appear hell bent on resolving regulatory issues with bass-ackwards methodologies. I ask that you listen to the instructors out there that have actually given many 100's of hours of instruction in ultralight class machines many for more than a decade. They, more than anybody, know what will be workable for US, the ultralight community. For without the acceptance of many quality instructors in the field, no proposal (especially Sport Pilot) will be safe for the general public and quite literally WON'T FLY. -live2av8-

Comment NO: 1651	**User Name: Ultraliteteacher**

Why not allow instruction for hire in any Light Sport Plane that is considered airworthy enough to take passengers? The aircraft itself is no less safe simply because instruction is taking place. A student will be better able to judge for himself the aircraft's airworthiness than a typical passenger, since the student will be taught to preflight the aircraft for himself. Additionally, there are few aircraft anywhere that get inspected more often than an aircraft used for training. The

only 'real world' effect of limiting training aircraft would be to have fewer of them available, causing more hours to be put onto less aircraft. Also availability of instruction would be hampered. Both results are a detriment to safety. For every LSP/ExLSP aircraft where there is no factory built trainer available, there can be no 'expert' instructors who teach flight every day in such a plane. Only by having every type of Sport Plane (not just special factory built models) available for instructors to choose from, can highly competent make/model specific instruction develop. Please alter the rule to allow compensated instruction in any Light Sport Plane.

Comment NO: 1653	**User Name: Ultraliteteacher**

Are there any specifics of how the FAA air traffic controllers plan to merge 25 knot parachutes with 50 knot fixed wings with 80 knot GA and 120 knot warbirds? Is there thought of remedial instruction for the GA pilots to learn how to fly behind slow moving aircraft in the pattern? Now consider the non-tower GA airport where the pilot's won't even have the tower guidance to help them with landing spacing. Is the FAA going to mandate low/high speed separation training in the GA BFR's for the next few years until the GA folk are competent to fly with us slow movers? I just don't wish to get run over by the GA folks.

Comment NO: 1655	**User Name: Ultraliteteacher**

In the AIM, there are rules for which aircraft has priority over which. This works well for powered ultralights since it is easy to remember you are always low man on totem pole. Where do LSP aircraft fit into this pecking order? Are they up with GA or are they at the bottom with UL? How would the casual opposing pilot know the difference? I find that even when I fly GA, I prefer to think of myself as lowest priority as the safest idea. However, since there is a 'who has right of way over who' set of rules, we should know where LSP fits in.

Comment NO: 1670	**User Name: nleggett**

Hello, The Light Sport aviation system would be a useful form of general aviation that could continue to operate in rural areas when the rest of general aviation is shut down due to terrorist threats or events. See my comments in document number FAA-2001-11133-121 for details on Light Sport aviation and homeland defense. Nickolaus E. Leggett, Private Pilot

Comment NO: 1672	**User Name: falcon**

Yea, I have owned my Mooney Model 18 (Mooney Mite) since 1973. I had a total of 100 hours, mostly in Cessnas, when I first flew the mite. Granted the 150 has fixed gear but you still have to pay attention to what is happening when you fly any airplane, fixed or retractable gear. I believe the retactable gear restriction should be removed from the NPRM for the Mooney Models 18L, 18LA, 18C, and 18C-55. The retraction system is a manually operated and has never caused me any problems. There are three ways to check the gear position. The engine vacuum powers a vacuum motor to give a visual check. The position of the gear handle indicates if the gear is up or down and there is a small window in the nose wheel well to see the position of the nose gear. Much more positive than tha PA29R that I also fly. Let the dsigners decide the configuration of the LSA. Thank You.

Comment NO: 1721	**User Name: bleddy**

I'm an ulltralight pilot who doesn't want to fly at anything like 115 knots. If others want a less regulated class of light aircraft as described in the NPRM that's fine, but I see no reason to make any changes to Part 103 and the Part 103 instruction exemptions. I feel that any such changes represent a solution in search of a problem.

Comment NO: 1722	**User Name: bleddy**

I'm an ulltralight pilot who doesn't want to fly at anything like 115 knots. If others want a less regulated class of light aircraft as described in the NPRM that's fine, but I see no reason to make any changes to Part 103 and the Part 103 instruction exemptions. I feel that any such changes represent a solution in search of a problem.

Comment NO: 1737	User Name: evergreen

I believe that the weight, power and speed limitations on what can be a light sport aricraft should be raised so that popular single engine trainers would qualify - specifically the 150/152/140/120/citabria/... These all meet the intent of small 2 place, low power, fixed pitch, fixed gear, restricted range aircraft. The manufacturers of these aircraft might find sufficient market in the new Sport category to restart the production of these aircraft if they were included. This would be of benefit to all of GA by lowering the entry bar for more of the public to experience flying in a new "real airplane" as opposed to only older versions of these aircraft. There is no functional difference between my 7AC champ and a Cessna 140, and minimal differences - those being only to make it easier and safer for the inexperienced pilot - between the champ and a 150.

Comment NO: 1738	User Name: Spdrflyr

MAKE THE UL TRAINING EXEMPTION A PERMANENT SFAR. ...AND GOOD LUCK WITH WHATEVER YOU DO WITH THIS SPORT PILOT THING.

Comment NO: 1739	User Name: evergreen

The timeout for constructing a response to these questions is too short - It is impossible to construct a well reasoned response to several of these questions in the time allotted.. Conversely - I would like to applaud the FAA on using this medium for public submission of questions and comments and showing the comments of others. Keep it up, and please include the FAA's responses in this same venue so we can correlate the questions to the answers. Thank you

Comment NO: 1740	User Name: whiteman

I feel that as a nation we need an entry point to aviation for future pilots. While not being perfect this NPRM makes steps toward that end. If we can look to the past for answers I think that we will find that having a supply of trained pilots will be a benefit. Farther, I feel that for aviation to grow much past its present level and fulfull the its promise, a new idea is needed. Is this NPRM that idea? I think so.....

Comment NO: 1741	User Name: gkkrause

I aggree in general with the Sport Pilot proposed reg; however, I believe we (The USA) are now following the world instead of leading it as we have done in the past. I had most of my initial training in a Cessna 150 and I can not for the life of me come up with a reason why this aircraft or those of similar weight should not be included. As an older and heaver, 245lbs, pilot my choice would be very limited with the present weight limits. Speed is not a concern; however, weight is and as long as the proposed aircraft is easy to fly the gross weight should not be a limiting factor. Thank You.

Comment NO: 1748	User Name: Goflyslow2

PERSONAL RESPONSE TO THE SPORT PILOT NPRM John Ballantyne April 27, 2002 Docket Management System U.S. Department of Transportation Room Plaza 401 400 Seventh St., SW Washington, DC 20590-0001 Re: Certification of Aircraft and Airmen for the Operation of Light-Sport Aircraft; Proposed Rule Docket No. FAA-2001-11133; Notice no. 02-03 Commentor's background I have been involved in aviation all of my life of 56 years. My father and mother flew and we always had a family plane. I first soloed an airplane (Cessna 140) when 16 years old in 1962. I began hang gliding in 1977 and shortly thereafter became part owner of the dominant hang glider training school in southern California. For 3 years I taught ground school and primary flight training, and managed the facility at Playa del Rey, California. Circa 1979 the United States Hang Gliding Association (USHGA) formed a Powered Hang Glider Division for which I became a ground and flight instructor. Also for USHGA, John Lake and I conducted USHGA Powered Hang Glider Instructor seminars (ICP). In 1979 I was president of the Southland Hang Gliding Club which was the forerunner of the United States Hang Gliding Association. In 1980 I founded, owned and operated UltraSport, Inc., the first full service flight training and retail center for powered ultralight aviation in the Los Angeles area. I authored flight instructing programs and techniques including a tethered flight simulator that were publicized throughout the aviation

industry. During this time I became one of the first FAA Safety Counselors for powered ultralights. Based on my experience and industry notoriety, the Experimental Aircraft Association invited me to be the founding president of their Ultralight Division circa 1982-1984. I served in that volunteer role until shortly before EAA closed the division in 1984. At AOPA Air Safety Foundation I wrote the original FAA recognized ultralight pilot/instructor training program from which all others have been derived. This was shortly after the issuance of FAR Part 103 (Ultralight Vehicles). There was close cooperation with FAA Flight Standards and FAA Accident Analysis. I am the founder and past president of the United States Ultralight Association, Inc., the largest association devoted entirely to ultralight aviation in the world. On behalf of USUA I have written many petitions and exemption requests to FAA and developed member support programs of all kinds. I have served on the Board of Directors for the National Aeronautic Association for over 10 years. USUA's highest honor, the John Moody Award for outstanding contribution to ultralight aviation, was awarded to me in 1995. I am privileged to have received in 1999 the highest international microlight award, the Colibri Diploma as "the pre-eminent leader for ultralight and microlight aviation in the United States for 27 years." Only three other individuals have ever received a Colibri Diploma, and I am the only American. My certificates include FAA commercial pilot and instructor—glider and private privileges for airplane (ASEL) with an instrument rating, USHGA Master hang glider pilot/instructor, aero-towing exemption holder, and seminar presenter, AOPA Air Safety Foundation ultralight pilot, instructor, seminar presenter and USUA Ultralight Flight Instructor #1 and seminar presenter. I am the only individual to have received an FAA Commercial and Flight Instructor certificate by flying a trike (weight-shift control). I am the only individual who participated in every ARAC meeting from which Sport Pilot (NPRM 11133) has come. (Even the primary FAA representative missed a couple.) Finally, I care deeply about ultralight-type aviation, hang gliding and soaring, and hope to not only influence FAA but to influence others, too. Please consider my comments and agree in writing to FAA on those points you find valid—especially the two-level approach. It will take many comments to sway FAA to draw the ultralight exemptions into a second Special FAR, so I invite you join with me. Historic Overview FAA has made numerous attempts to resolve regulatory problems associated with their inability to keep up with the growing interest in air sports aviation in general, and ultralight aviation in particular. I have observed and participated in the development of these regulatory attempts by FAA including Ultralight Vehicles, Recreational Pilot, Primary Category Aircraft, Sport Plane and now Light Sport Aircraft/Sport Pilot. In the past 15 years FAA organized research groups (paid by public funds) including a major regulatory review by Booze Allen Hamilton in 1988-1989 and the Aviation Rulemaking Advisory Committee (ARAC) Ultralight Working Group from 1993-1999. In every case so far FAA has repeatedly (and admittedly) missed the regulatory need. This is simply because they do not comprehend the nature of the aviation segment they are trying to regulate. Over the past 30 years the convenience of jet powered commercial aircraft, combined with a vastly improved roadway system for modern automobiles, has gradually eroded the perceived utility of the four-place family airplane. At the same time the evolutionary trend has gradually increased the relative value of aviation sports where participants choose craft that often appear unconventional but fly well and are too slow to be used for reliable transportation. They are for fun flying. They cost no more than their motorized counterparts in water and land sports. Flying, especially at slow speeds and in open cockpits, is tremendously rewarding. It is like you are flying. This trend is not a reinvention of airplanes so much as an expansion of recreation. It is intensely personal. When allowed to let go of an unspoken need to regulate aviation as a transportation utility, the practical side of the regulatory approach changes. Risk management is different for pilots slow speed and low inertia aircraft. Danger tends to develop more slowly allowing the pilot to take corrective action based on a thought process more than relying on checklists. Therefore ultralight pilot training programs weight the decision-making process more than the emergency checklist type of approach required when flying relatively fast, heavy aircraft. FAAs focus on transportation is precluding a clear view of the issues in air sports. NPRM 11133 says in part, "**There is uncertainty as to what extent the NTSB's database has fully captured those accidents involving unregistered light-sport aircraft over the past 10 years... There is uncertainty as to what extent these exemption holders' databases have fully captured those accidents for unregistered light-sport aircraft over the past 10 years... Because the accident

databases listed above may not capture all relevant accidents, the potential safety benefits estimate for light-sport aircraft may be understated." The existing regulatory system does not provide for a reasonable path of entry and progressive development for ultralight/microlight pilots and instructors. The result is safety problems that are hidden from statistical analysis because FAA and NTSB ignore most microlight accidents (i.e. experimental-aircraft-with-ultralight-operating-characteristics). This is a serious matter. Some individuals have unnecessarily died because the reporting systems have failed to reveal common causes of accidents from which others could learn and improved regulatory programs created. It also prevents a reasonable business environment on which to base an industry. The cost of being unresponsive to this evolutionary trend is measured in wasted money and lives. Yet, interest in microlight aviation is very strong in America and elsewhere around the world. In 1994, twenty-five countries reported to the international microlight commission more than 82,000 active pilots and 47,000 microlights that flew more than one million flight hours. One hundred eleven manufacturers reported a production total of 4,954 new planes just during that 12-month period. Each year the United States Ultralight Association, Inc. receives growing numbers of inquires by those who hope to fulfill life-long dreams of personal flight. These numbers illustrate that many individuals worldwide are attracted to aviation sports for the deep fulfillment and personal accomplishment which fun flying offers. ARAC Aug 17, 1993-Ultralight Vehicle Working Group FAA created a working group for "ultralights" on August 17, 1993. The purpose was to address the petitions of the USUA and generally to address the cadre of air sports aircraft and pilots that had developed during recent history. FAAs NPRM 11133 reports that it considered all, and incorporated some, of the ARAC committee recommendations. But there is much more to the story. First ARAC Recommendation (Unanimity!) After many meeting and long discussions, the Ultralight ARAC group met in December, 1995, and proudly voted to hand the draft NPRM to FAA. The agreement was not merely "consensus," but unanimous—no dissenters or withheld votes whatsoever. Interestingly, however, the proposal then was very different. It recommended to FAA: An aircraft maximum weight of 992 pounds (450 kilos), and Stall speed of 35 kts, No flights over congested areas, and to Otherwise resemble ultralight regulation (Part 103). An "Umbrella of Standards" would permit any form of new aircraft and pilot programs without rulemaking—even those kinds not yet invented. Every group agreed to recommend no changes to part 103, ultralight regulation. A separate FAR part was recommended and it would be named "Microlight." What happened when ARAC unanimously (and very proudly) agreed to hand the finished recommendations NPRM to FAA just before Christmas in 1995? Silence. After some weeks had passed there came reports of FAA holding private meetings with notable individuals from general aviation, and the Experimental Aircraft Association in particular. After a full year of stalling, FAA began to call another set of ARAC meetings. By then most of the sporting groups had lost faith in the sincerity of FAA and the meetings became dominated with associations such as EAA, Aero Sports Connection, Capella and the Small Aircraft Manufacturers Association. They gained a majority of voting power and created a new recommendation with much higher weight, speed and pilot privileges. Sometime between the end of the ARAC meetings and the release of Sport Pilot (NPRM 11133), FAA internally decided to again increase the weights for some reason. Only that second, final recommendation is reported by FAA. FAA says, "The ARAC working group submitted its recommendations to FAA for review in July, 1998. Much of FAA's proposal is based on ARAC's sport pilot certification recommendation..." The FAA did not adopt even one portion of the original, unanimous ARAC recommendations. But they were valid recommendations and should not be lost just because they weren't what FAA wanted to hear. ARAC did not recommend use of FAR 61 & 91 FAA writes, "The ARAC recommended FAA include detailed privileges and limits in part 61…" This is incorrect. The ARAC group first recommended a new regulation (FAR). FAA made it clear that that was not an option, so the ARAC group reluctantly compromised by saying that FAA could place it as they wished so long as the tone, feel and intention was met. FAA immediately responded that Parts 61 and 91 would be the location, and now reports to the public that it was an ARAC recommendation. International Harmonization Issues Additionally, the international microlight community has provided (1994) written encouragement for FAA to adopt international microlight aircraft parameters which were exactly included in the first ARAC recommendation. FAA has completely ignored this recommendation by the principal international

representative group and instead refers to a few individual countries that have the expanded definitions that apparently better suits FAA intention. The increases from 992 pounds maximum to 1232; and especially the increase from 35 knot stall to 44 knot stall, is significant and in my experience has a profound effect on aircraft airworthiness and pilot training requirements. FAA simply states that, "[International harmonization]…is based on the premise that the number of the requirements contained in the proposal (namely, aircraft certification standards) essentially mirrors those that already exist internationally." This is insufficient justification to my mind. Aviation Disciplines Ultralight aviation is a cultural matter as well as technical specialty. Those who fly for fun have different regulatory needs than those intending to fly traditional aircraft for personal transportation in the airways and over cities. This cultural issue may again be being submerged under the push for a reduced medical and cheaper aircraft for existing pilots, the apparent thrust of Sport Pilot (NPRM 11133). FAA staff are, in general, very educated and caring people. I enjoy knowing many of them and like the debating event that often occurs when I am in their Washington DC offices. FAA headquarters is less than 50 miles from my home, so I visit FAA whenever it seems advantageous. However, not one single FAA employee within flight standards headquarters has personally flown ultralights on a regular basis for recreation. Flight standards is where pilot and instructor programs are created. The vacuum of actual, personal involvement in ultralight air sports has meant that hearsay and preconceived notions have become the basis for regulatory "improvement" at FAA headquarters. FAA focus on transportation is eclipsing an accurate view of air sports aviation. Because they do not understand this aviation group, their regulatory approaches have not worked well. The primary FAA representative to the Sport Pilot ARAC meetings retired shortly after the meetings stopped. The very nice and capable person who is the new Sport Pilot coordinator and spokesperson never actually attended any sport pilot ARAC working group meeting. In fact no FAA employed now involved has first hand knowledge of the political and cultural issues that were discussed for so many hours. It is better when the regulators participate in the community to be regulated. Surely the airlines would not stand for a regulatory department of individuals who had no commercial aviation experience. What if a town council in Iowa regulated a town in Oregon? I don’t think so. No FAA employees in Flight Standards have yet been ultralighters, and none have regularly personally attended the ARAC meetings. I believe this reduces the quality of rule proposals such as NPRM 11133, and makes comments from the aviation community more important. Personal Recommendations Sport Pilot: A Two-Tiered Approach is Required I support a process for the slower, simpler fat single and two-place ultralights, and also I do not object to the FAA proposed higher parameters as they may also benefit some of my fellow aviators. I agree with USUA which believes both things should take place, both methods through 2 special regulations (S-FARS)—one S-FAR as now proposed and a second S-FAR associated with ultralight regulation to support the fat and two-place ultralights as proposed originally by ARAC when it was composed of more air sports groups. Basic proposal is OK for existing FAA pilots Overall, the existing FAA proposal would be helpful to existing FAA licensed pilots and instructors. Some want to increase their flight privileges to include faster aircraft and overflight of cities. The proposed rule could provide that. I also believe the definition of the aircraft which a sport pilot could fly should be increased enough to include aircraft such as Cessna 150, 152, Piper Tomahawk, and other common 2-place general aviation aircraft. Finally, FAA might be wise to simply incorporate these changes into Recreational Pilot as FAA so strongly lobbied for during many ARAC meetings. The trick for FAA will be to adopt programs with these broad pilot privileges that end up being significantly "less" than the long-standing private pilot certificate (the downfall of Recreational Pilot). Of special significance and commendation are the proposed new categories of aircraft for powered parachutes and trikes (weight-shift to FAA). This is very important as it would allow full private piloting privileges and would not limit powered parachutes and trikes to only 2 seats. If, as I fear might be the case, the sport pilot certificate gets too close to the private certificate, applicants could select to go directly to private while being trained entirely in powered parachutes or trikes as they choose. This may end up being the most successful part of the entire proposal related to pilot and instructor certification. Forcing all fat-single and two-seaters pilots into higher, further and faster aircraft is excessive, unnecessary and dangerous. Many with whom I have spoken only want reasonable regulatory avenue to fly "fat" single and

two-place ultralights for recreation. USUA and other groups have repeatedly petitioned FAA about this. FAA's proposed requirement for every pilot and instructor of fat single seaters and two-place ultralight trainers go back into training for 130 mph aircraft is simply overkill. Each pilot would have to pass a comprehensive written test on general aviation rules (parts 61 & 91), an oral examination and flight test using some notoriously difficult to fly aircraft which could have top speeds over 130 mph and fly over our cities and towns. Existing ultralight operations demonstrate that many individuals prefer to give up such transportation-oriented speeds and over-city flights in trade for more recreationally oriented training programs such as now in use by several ultralight associations. Solution: Second level tier What I believe FAA should do is to create a two-tiered approach: sport pilot as proposed, and a second tier to address fat single and two-place ultralights. This mirrors the original ARAC recommendation for a separate FAR. Just as FAA proposes to attach a special federal regulation (S-FAR) named Sport Pilot to existing regulations of parts 61 & 91, I recommend that FAA attach a second S-FAR, named Ultralight Aircraft, to part 103 (Ultralight Vehicles). Two-seaters for training and recreation, "fat" single-seaters Here is where the original, unanimous, ARAC recommendation can again be utilized. Bring into the second level tier the two-place training programs, recreational use of two-seaters, and a modestly increased definition for single seaters (H. O. Scale) as has been discussed and requested for decades by USUA, the international microlight commission, other air sports organizations and contained within the sport pilot ARAC's first recommendation. Two-seater Ultralights FAA mistakenly reports that, "… in 1995 when it issued the first exemption from part 103 for training." [Emphasis is mine] This is a very inaccurate and seriously misleading statement by FAA. FAA actually began issuing exemptions allowing two-seat ultralights for training in 1983, only 9 months after issuing ultralight regulation (part 103) in October 1982. FAA has repeatedly renewed these exemptions to 4 or 5 various organizations every two years thereafter for almost 2 decades. Interestingly, FAA also states, "Although we [FAA] issued exemptions to temporarily resolve the training issues, to extend them on a long-term basis would be an inappropriate use of the exemption process [emphasis is mine]. 'The FAA believes that a permanent and appropriate level of regulation is necessary." I don't know how many years FAA has to continuously issue an exemption before it is considered "inappropriate use of the exemption process." But nineteen consecutive years of uninterrupted exemption renewals for multiple associations surely demonstrates the importance and significance to both FAA and the ultralight community for the need for two-place "ultralights." It also illustrates that the ultralight community has, in fact, operated two-seaters although the actual ultralight rule limits ultralights to only one seat. In practice FAA has (sensibly) allowed two-seaters since the beginning. It is important to keep open the option for the training programs developed around two-seat ultralights. And through the years it has become clear that those who were trained in two-seat ultralights learned to fly two-seat ultralights. The Solution: FAA should add a stage, or tier, of regulation to the proposal The additional S-FAR should be similar to the S-FAR now proposed by FAA in that the Ultralight Aircraft S-FAR would provide FAA certificates for pilots and instructors, and "N" numbers for the aircraft. The written, oral and flight tests would be based on existing ultralight programs and enforced by FAA. Administration of the program might be, or might not be, through membership associations. The operating rules would come from part 103 including prohibition on flights over congested areas, not into ATC controlled airspace without prior permission, and no night flying—exactly as ultralight vehicles are presently limited. Now proposed by FAA: I recommend that a second-level be added: This two-tiered approach encourages the FAA "Sport Pilot" to be finalized while permitting ultralighters to gain the authority for two-seat recreation use under the more restrictive ultralight regulation. This second option is critical for those who want to fly today's ultralights and do not mind being relegated to rural areas. I also recommend that FAR part 103 (Ultralight Vehicles) to be left unchanged. FAA Proposed Pilot/Instructor Program Requirements Are Impossible to Evaluate Sport pilot and instructor training programs are impossible to evaluate because they do not exist. FAA says that it will take from industry programs when establishing the standards (Pilot Testing Standards, PTS). But will FAA derive a program significantly different that private pilot? Only time will tell. Airworthiness "Consensus Standard" Impossible to Evaluate It is not possible to evaluate the contents of the airworthiness "consensus standards" for light sport aircraft as proposed by FAA until such standards exist. FAA words the NPRM to almost

lead the reader to believe that the manufacturers will have say over the contents of the program, but FAA certainly has the last and final approval authority. How appropriate and reasonable will FAA be? We cannot know until we see a finished consensus standard. Therefore ultralight manufacturers, the FAA, and other affected parties should get together and create and publish the industry consensus standard before the public is obligated to respond to the NPRM without a full awareness of the ramifications of the light-sport aircraft certification process and costs. Aircraft Options Need Not Be Withheld Ultralight aviation has hosted vehicles with retractable land gear, variable pitch propellers, multi engines, and even an occasional pure-jet engine. FAA now proposes to make those combinations unavailable to sport pilots even though they will "be trained to a higher standard." Why should this be? I am aware of no evidence that these options have caused significant or wide-spread safety problems in single and two-seat ultralights. Even model airplanes now have functional turbine engines. Some designers are talking of ultralight-type aircraft with multi engines (maybe 6, 8 or more engines) to minimize the dependence on any one engine. Retractable landing gear and variable pitch propellers are not complex devices only for those pilots with superior intelligence. Besides, some ultralighters have superior intelligence. The largest reported complexity with retractable landing gear is simply remembering to put it down before landing. Let's let those who are willing to accept additional training and receive an instructor's log endorsement utilize these devices if they wish. Include all Sport Aviation Segments In addition to the groups addressed by FAA in NPRM 11133, I would like to specifically recommend that at least the Ultralight Vehicle SFAR include: gyroplanes (one and two-seaters), tandem hang gliding, tandem powered paragliding and aero-towing of hang gliders which have somehow been left out of FAAs NPRM 11133. These activities have taken place under FAA exemption for many years and there is no basis in safety to terminate the activity of which I am aware. By issuing and reissuing exemptions for these purposes, FAA implies that aero-towing, two-place training and recreational flying in all forms of "ultralight" flying, including powered paragliding are important. This is correct. Also consider the fact that the tandem exemption for hang gliding includes the option of passenger flights for recreation. This has caused no problems. These items should be perpetuated by inclusion in the Ultralight Vehicle SFAR as they are allowed by exemption today. To leave out these segments is to create a safety problem related to training because it will force single place training to be the only option. This is where the instructor (if there is one) stands on the ground and coaches (by hand signals or radio) the student's first flights. Surely FAA does not deliberately intend to do this. Category/Class Checkout Will Satisfy Safety Issues Pilot and instructor make/model-specific checkouts is unwarranted based on my considerable experience in providing transition training. Transition training is sometimes important, but it need not be federal law. The requirements within an Ultralight Aircraft (SFAR) instructor "aircraft" check out should be identical to what it is under the several training exemptions. Namely this is category/class checkout by a qualified instructor, but no make/model specific requirement. Again, accident data supporting an increase in existing requirements for the same aircraft is non-existent (remember the tier named Ultralight Vehicle SFAR is limited to only those two-place craft now known as ultralight trainers). Closing I appreciate the opportunity to make this personal comment for all to read. I hope it influences FAA. Too often my personal work in "industry and government" working groups has suffered from major compromise and political shenanigans. I love air sports aviation. What I recommend is from my deepest convictions and based on thousands of hours of flying and teaching. John Ballantyne

Comment NO: 1759	**User Name: BigSkyAviation**

The 103 instructors were never polled about this NPRM. The orgs that represent us have taken positions based on their own interests, not the interest of the membership. Lately the USUA has taken a position that is popular with the group of pilots flying under part 103 (with exemption). A no-medical rec license to fly non-complex planes in daytime VFR would serve a larger population of the small airplane (UL as well as GA) pilots. Separate the new aircraft cert from the pilot cert. They should not be in the same NPRM.

Comment NO: 1772	User Name: edburkhead

I've seen a lot of competence and incompetence in the ranks of private pilots. I'd feel safer seeing my six-year old daughter go up with a sport pilot in one of the two-seat "ultralights" with a ballistic parachute than I would seeing her go with a private pilot in a certified light plane. I'd like to request one or more of these possibilities: 1. Any certificated aircraft which meets the Light-Sport Aircraft requirements at the moment of takeoff and throughout the flight may be flown by a Sport Pilot under the Sport Pilot / Light-Sport Aircraft rules. Just as a Private Pilot is eligible to fly a Light-Sport Aircraft under Light-Sport Aircraft rules, a certificated aircraft may be flown by a Sport Pilot provided it meets the Light-Sport Aircraft rules DURING the flight. If flown by a Sport Pilot, the pilot must satisfy the same make and model training requirements as for any other Light-Sport Aircraft. The aircraft's eligibility may be established by an AI and recorded in the aircraft's logbook. Aircraft performance must be within the Light-Sport Aircraft category. The aircraft's gross weight must satisfy the Light-Sport Aircraft rules only during flights in which a Sport Pilot is pilot in command – this may require that the flight be conducted at less than the aircraft's certificated gross weight. 2. An aircraft may be flown as a Light-Sport Aircraft if it's gross weight is less than 750 Kg (1653.5 lb.) at takeoff. Justification: It's silly to exclude a Cessna 152 while allowing much more dangerous planes to be flown as Light-Sport Aircraft.If the aircraft can't be flown to a foreign country as a Light-Sport Aircraft at this gross weight, then it can't. Our nation is large and populous enough to adjust our Light-Sport Aircraft rules to our predominance of wide-open spaces and long distances. 3. A certificated aircraft which does not exceed the maximum level-flight airspeeds of the Light-Sport Aircraft rules may fly as a Light-Sport Aircraft even if it's minimum flying speed or stall speed is higher than is required for pure Light-Sport Aircraft. This will be allowed because the certificated aircraft has undergone much more rigorous development, testing and certification than Light-Sport Aircraft. 4. I think it's silly to deny owners of Light Sport Aircraft the use of such things as adjustable or constant speed propellers and retractable landing gear. These are available on unlicensed ultralight aircraft and can perform adequately. 5. It's also silly to deny Light Sport Aircraft the use of the airspace above 10,000 feet. Like any other aircraft, Light Sport Aircraft in this airspace should have transponders and, if high enough, use oxygen.

Comment NO: 1776	User Name: AmesJW

I would like to see the gross weight allowance increased to at least 1300 or 1350 lbs. or even greater, to include aircraft such as Cessna 150, 152, Piper Tomahawk, and other common 2-place general aviation aircraft. I would also like to see the inclusion of in-flight adjustable propellers.

Comment NO: 1784	User Name: fnad

I understand that there is a proposed 2000 AGL ceiling for PPC's. I live in the Alaskan bush. Much of Alaska is being locked up into National Parks and Preserves by the environmentalists. There is a 2000' AGL minimum to fly over parks and preserves. The 2000' AGL ceiling would make much of Alaska and the Lower 48 off-limits. We often change altitude to shake off carb ice problems. The 2000' AGL limit would make this impossible and make flying more risky. Also, why should the Sport Pilot have a restriciton that FAR 103 folks don't have or need? Trash the 2000' AGL ceiling. It doesn't make a bit of sense. Why would we need a notarized copy of pilot records from the ultralight organization in order for our flight time in ultralights to be counted toward a Sport pilot rating." Does anyone know how far it is to the nearest notary from here? (Alaskan Bush) What organization would I go to? The one 3000 miles away? Hello!!!! Do we want to expand the sport or collapse it? Also in regard to the mechanical inspection: No PPC is made for the bush. I do most of my flying in sub freezing and sub zero temps on skiis. Winter is the best and safest time of year for me. I have made modifications on my rig to protect the throttle from ice and snow and done several other things to make the rig safer. Who could inspect these modifications? Is someone going to come with a list of stuff drawn up in Arizona and make me comply? This Sport Pilot thing is happening way too fast. Folks are still learning the questions and don't have answers. I think it should be open for discussion for at least another year. There's lots of stuff the designers didn't think of. While I'm at it, I would like to say: I have been a professional

educator for over 25 years. The FAA materials for the FOI (Fundamentals of Instruction) are excellent. Couldn't be written better. The test for the FOI is one of the worst tests I have seen in my educational career. It doesn't test for what the materials try to teach. Horrible. An excellent teacher could flunk the test after reading the material several times.

Comment NO: 1804	**User Name: Haydon**

There is one aircraft that I know of that fits all the proposed specs except it has two engines. So why not have a type rateing added to the rule so that thoes of us who have flown multi engine for many years could enjoy the safety afforded by two engines.

Comment NO: 1812	**User Name: steve.stefanic**

In general, I agree with JOhn Ballantyne's response below. As an ex-military pilot from the 1960', I am looking for a economical way of entering back into flying just for the enjoyment of it after I retire from my engineering job. I have an ultralight instructor certificate & about 16 hours in ultralights. For flying here in the high mountain valleys of Colorado, I feel better about the safety aspects of a reliable 4-cycle engine; something which is out of the question under single-place UL part 103. The Sport Pilot ruling would provide some flexibility in weight & engine selection. Thank you for providing this excellent internet method of commenting on your proposed ruling. Please keep us informed using a similar internet method. Respectfully, Steve Stefanic

Comment NO: 1815	**User Name: frjn33**

One of the issues that you will probably never be able to address is how the ARAC got so far off track. Please read John Ballantyne's comments. What started out to be an action to benefit the ultralighters became something to benefit those who wish to fly General Aviation, but have problems with keeping a class three physical current. Please, think again. Most of us with whom I am aquainted want to be able to fly inexpensively and simply. We are willing to take more training to gain more privileges. Many of us will be priced out of the market is the prediction I am hearing. For the instructors especially, the prospects of trying to train new students under this rule are slim. Why? One, because you will only grandfather AFI's, not CFI's. This implies that you do not trust the very organizations to whom you have granted exemptions to be able to train in 2-seat ultralights. It would appear that you do not believe that the trainers are adequate trained. If so, why didn't you address this with the ultralight organizations? Please read John Ballantyne's comments and take them to heart. I am a member of USUA, ASC, and EAA. I most trust USUA to represent my interests, followed closely by ASC. EAA, not really. They are much more interested in serving their aging membership who have trouble with the arcane and unrealistic provisions of a class-three medical than they are in true ultralighting. That's how USUA came into existence in the first place. I beg you to carefully consider a way to simplify this rule. Drop the three-year phase-out of existing trainers. This does no one any good except a few of the manufacturers. Others of the manufactures will undoubtedly go out of business. Make existing BFI's able to easily and affordably transition to Light Sport Pilot Instructors IF THEY WANT TO. Otherwise, write into FAR 103 a statement granting authority to those organizations whom you approve to conduct instruction in two-seat ultralight aircraft for those who wish to fly under FAR 103.

Comment NO: 1816	User Name: frjn33

A continuation of my comments, because striking the wrong key posted my unfinished comments too soon: It would appear that FAA and EAA are anticipating great gains at the upper end of the Sport Light spectrum. For those of us who love slow flying in out-of-the-way places, this NPRM does not help. The ARAC was formed to address the "ultralight problem," according to commentaries openly available. What we needed was a way to fly very light aircraft in a safe, responsible way. What comes out is a way for those who have much more substantial financial means to fly light General Aviation style aircraft. If you don't believe me, look at the comments of those who are begging you to make Cessna 150's, 152's and two-seat Pipers fit into this category. That, friends, is watered-down General Aviation, not the next logical step in ultralighting. The ultralight movement has contributed much to aircraft innovation. The complex rules about being able to modify your aircraft, develop new ones, and then have to go through the hoops of having them certificated, if you want to sell them as trainers, are just too rigid, heavy and restrictive. There is a tale by Leo Tolstoy that tells of the King of England sending the Russian Czar a tiny wind-up flea that danced. The Czar was amazed and at first delighted. However, he felt that the English king was flaunting their technology and was determined to show that king what good, Russian technology could do, so he sent the mechanical flea to one of his best craftsmen. The craftsman fitted the flea with beautiful steel boots. The Czar proudly sent the flea back to the English monarch. The king was puzzled. He wound up the flea, turned on the tiny switch, but the flea could no longer dance. The boots were too heavy. Please do not make the boots too heavy for this new proposal to be able to fly. (Pardon the pun.) Use the KISS principal, please. Please? I know you can do it. I'm praying that you will be able to do it. Peace, Fr. John Elledge Havre de Grace, MD (where the Susquehanna empties into the upper Chesapeake Bay. Come see us. It's beautiful.)

Comment NO: 1842	User Name: megamouse

1) Allow Sport Pilots or higher should be able fly the current 2-place, UL trainers whether they be certified, experimental, or uncertified. Reason: Flight restrictions on aircraft type should be based on aircraft flight characteristics, not how liscensed. 2) Allow UL instructors who are not licensed as sport pilot or higher to use 2-plane UL trainer for UL instruction reguardless of registration catagory. Reason: A/C flight characteristics rather than registration method should be basis for pilot qualificaitons to fly it. 3) Allow CFI's to be sport pilot instructors (I think proposal says that.), and both CFI's and sport pilot instructors to teach UL pilots. OK to require a minimum time in type prior giving instruction. Reason: Make qualified instructors available to student pilots.

Comment NO: 1843	User Name: jjparker

I am a USUA BFI instructor and think that for existing FAA pilots I would say this is probably a good thing but to force ultralighters and instructors into faster aircraft is a mistake we like it simple and this will not improve safety. I believe most ultralighters fly because its inexpensive free from excessive regulations and are more than happy to stay away from cities.and large airports Leave 103 alone and add a second level s-far ultralights: two seaters max 496lbs,86mph max,:single seaters 369lbs,rural daytime like 103 I am very concerned about the altitude restriction of 2000 agl.This would force a lightly wingloaded ultralight to fly into deadly rotors and dust devil conditions in the high dessert and mountains of the northwest.I land and teach at strips over 7000msl with mountains of 13,000 msl and also because of the limited glide slope of ultralights this would create a extremely deadly hazard in the event of an engine out. I am afraid this will cause many rural instructors like myself to stop teaching because of increased cost and will lead many to try and teach themselves and you know what happens then. please keep it simple like our aircraft John Parker