



August 10, 2016

U.S. Department of Transportation
Docket Operations
1200 New Jersey Avenue, SE Room, W12-140
Washington, DC 20590-0001

To Whom it May Concern,

The Experimental Aircraft Association (EAA) is the world leader in recreational aviation. With an international membership of close to 200,000 people in over 100 nations, EAA brings together pilots, aircraft builders, owners, and aviation enthusiasts who are dedicated to sharing *the Spirit of Aviation* by promoting the continued growth of aviation, the preservation of its history and a commitment to its future.

EAA is commenting on the FAA's proposed rulemaking entitled *Regulatory Relief; Aviation Training Devices; Pilot Certification, Training, and Pilot Schools; and Other Provisions*, docket number FAA-2016-6142.

EAA applauds the FAA for taking action to award credit for dual time logged with Sport Pilot CFIs (or "Subpart K" CFIs, in reference to the Part 61 citation) for use towards higher ratings. This is a common-sense provision that the NPRM rightly noted will provide significant cost savings as sport pilots advance to higher ratings. It will also enhance the Sport Pilot rating as an attractive, affordable entry point to aviation and gateway to higher ratings, as was always intended.

However, EAA strongly urges the FAA to allow *all* hours with a Sport Pilot CFI to count toward higher ratings, without instituting a cap on maximum credit for those hours. There is no safety benefit to the limit. The Light Sport certificate provides the pilot with the same fundamental knowledge that any other certificate is built upon, and a Subpart K instructor is equally capable of delivering instruction on any of these points as any other CFI. As students move beyond the Sport Pilot curriculum they will receive instruction from an appropriately-rated instructor, but the fundamentals taught to Sport Pilots are not cheapened if the teacher holds a Subpart K rating.

Limiting credit for dual time logged with Subpart K instructors also places a recordkeeping burden on student pilots to categorize dual hours, and it places the onus on DPEs to verify the proper credentials of instructors providing time logged. The complexities of categorizing and verifying time logged with different classes of CFIs introduces hassle in the flight training process for no safety benefit.

Again, EAA is pleased to see that the FAA took the positive step of allowing dual time logged with Sport Pilot CFIs to count toward higher ratings. We urge the Agency not to overcomplicate the process for the sake of a perceived benefit in safety, a benefit we find dubious.

Respectfully,

A handwritten signature in black ink, appearing to read "Sean Elliott". The signature is fluid and cursive, with the first name "Sean" and the last name "Elliott" clearly distinguishable.

Sean Elliott

EAA Vice President, Advocacy and Safety