

This comment is in response to the FAA NPRM for Sport Pilot/Light Sport Pilot.

I understand that the proposed rules would effectively eliminate tandem flying instruction and aero towing. Although this, I am sure is not the intent of the FAA in its rulemaking, it would be the unintended consequence of enacting this rule as written.

CONCERNING TANDEM HANG GLIDING: This form of instruction allows for the greatest margin of safety in training new pilots. Imagine trying to teach motorized aircraft students without having an instructor beside them. It is unsafe. Additionally, imposing new, more restrictive rules for tandem certification and instruction would drive current instructors from the business of teaching by this method because of prohibitive costs. USHGA currently monitors all tandem flying and has proven over the years that it is safe, effective, and enjoyable for all participants. Our policy of communicating teaching techniques, problems, and even accident reports, ensures a level of reporting, education and safety that the FAA would applaud.

To impose these proposed rules would eliminate an affordable and safe introduction to the world of flying for many people. Please work with the USHGA administration to incorporate viable guidelines to ensure continued safe enjoyment of this sport through tandem instruction.

CONCERNING AERO TOWING: The majority of the best flying and instruction takes place far from any foot launchable hills. The restrictions this rule places on tug pilots would make a marginally profitable business completely cost prohibitive to comply with and operate within the rules. This would force the closing of these operations across the nation. It would effectively eliminate 10 years of growth and education of our sport. It would wipe out the possibility of international competitions in the flat areas of the country. It would eliminate the tourism dollars and the tax base of those businesses that flourish on the east coast.

USHGA and the ultralight community have worked hard to ensure that the aircraft meet the highest standards of safety and performance. These organizations have also worked to ensure the highest levels of competence and safety of the operators. Our documented safety record is something we as a community are proud of. No other self regulated sport can claim the level of oversight, training, education, and safety that the USHGA has achieved.

Please allow aero towing to continue under the control of USHGA and ultralight organizations.

Thank you,

Fitzhugh Gary