

Proposal No.	Regulations Changed	Summary of Proposed Changes	Potential Impact Positive Negative Neutral Undetermined	AOPA Position
1	§ 61.1(b)(13)	Proposes to define “night vision goggles” (NVG) under § 61.1(b)(13) as “an appliance worn by a pilot that enhances the pilot’s ability to maintain visual surface reference at night.”	Undetermined	Need more information from users of NVG to determine impact
2	§ 61.1(b)(14)	Proposes to define “night vision goggle operation” under § 61.1(b)(14) as “a flight at night where the pilot maintains visual surface reference utilizing NVGs in an aircraft that is approved for NVG operations.”	Undetermined	Need more information from users of NVG to determine impact
3	§ 61.1(b)(2)(i)) § 61.1(b)(2)(i) i) § 61.1(b)(5) § 61.1(b)(22) § 61.3(a)(1) §61.3(f)(2)(i) & (ii) § 61.3(c) § 61.3(g)(2)(i), (ii) § 61.75(b)(2) § 61.69(a)(1) § 61.75(d) § 61.77(b)(1) § 61.133(a)(1)) § 61.153(d) § 61.167(a) § 61.167(b)(3) § 61.193 § 61.197(a) § 61.215(a), (c), (d) § 61.215(b)	Proposes definitions for the terms “current” and “valid” to qualify when a person must hold a “valid,” “current,” or a “valid and current” pilot, flight instructor, and ground instructor certificate, rating, or authorization under part 61 to exercise the privileges of that certificate. A “valid” pilot, flight instructor, or ground instructor certificate, rating, or authorization would mean the certificate has not been surrendered, suspended, revoked, or expired. The term “current” as it relates to a pilot certificate, rating, or authorization would mean the pilot has met the appropriate recent flight experience requirements under part 61 for the flight operation being conducted. The term “current” as it relates to a flight instructor certificate would mean the flight instructor meets the flight instructor recent experience required under § 61.197. The term “current” as it relates to a ground instructor certificate would mean the ground instructor meets the recent experience required under § 61.217.	Negative	Oppose Change - The FAA’s attempt to clarify the meaning of these two terms will only result in more confusion. The scenarios surrounding the currency or validity of a certificate change with any given situation. Trying to add regulatory language to address these will be extremely difficult.

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4	§ 61.3(j)(1) § 61.3(j)(3)	Existing regulation dealing with age limitations for scheduled international air services makes reference to obsolete dates and is no longer needed. The rule states “Until December 20, 1999, a person may serve as a pilot in operations covered by this paragraph after that person has reached his or her 60 th birthday if, on March 20, 1997, that person was employed as a pilot in operations covered by this paragraph.” December 20, 1999 has now passed, and the FAA is proposing to delete § 61.3(j)(3) in its entirety.	Neutral	No Action
5	§ 61.19(b)	Proposes to amend § 61.19(b) so that the duration period for the student pilot certificate coincides with the medical duration provisions under § 61.23(c)(3). Corrects situation where student pilot certificate was only valid for 24 months when the medical certificate was valid for 36 months.	Positive	Support Change – Corrects the “gotcha” where a medical certificate could be valid for 36 months (under the age of 40) and a student certificate (24 months) issue on the back of the same piece of paper has expired.
6	§ 61.19(b)(3)	Extends the duration period of a student pilot certificate for persons seeking a balloon or glider rating to 36 calendar months.	Positive	Support Change - Persons seeking a balloon or glider rating are not required to hold a medical certificate; FAA is extending the duration of student pilot certificate for balloon and glider to 36 calendar months regardless of the age of the applicant.

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7	§ 61.19(d) § 61.197(a)(2)) § 61.199(a)	Establish flight instructor certificates without expiration dates. The FAA would still require that flight instructors renew their privileges every 24 calendar months to exercise the privileges of their flight instructor certificate, but it would be done without requiring the re-issuance of the flight instructor certificate. The FAA envisions that flight instructor renewal applicants would continue to send a completed FAA Form 8710-1, “Airman Certificate and/or Rating Application” to the FAA’s Airman Certification Branch in Oklahoma City, OK, but the applicants would then only be required to have their logbooks endorsed by a FIRC operator or by the FAA. In lieu of the logbook endorsement, the flight instructor renewal applicant could simply receive a completion certificate or a stamp in their logbook from a FIRC operator or from the FAA.	Positive*	Support Change – The FAA acknowledged an ASF petition from 1999 requesting this change. Also clarifies that taking either a check ride for one of the existing privileges or for a new privilege can renew an expired certificate. * However , we will need to pursue alternatives With ASF and FAA regarding submission of 8710 for tracking purposes.
8	§ 61.19(e)	Proposes to amend § 61.19(e) by linking the currency requirements for the ground instructor certificate with the duration period requirements. The purpose is to further clarify the currency requirements for ground instructors.	Neutral	No Action
9	§ 61.23(a)(3)(i v)-(v) § 61.23(a)(3) (vii)	Amends § 61.23(a)(3)(vii) to require Examiners to hold only a 3 rd class medical certificate (with an exception for Examiners administering practical tests in a glider or balloon).	Positive	Support Change – Codifies existing guidance all ready provided in FAA orders to only require 3 rd class medical for examiners (with an exception for Examiners administering practical tests in a glider or balloon).
10	§ 61.23(b)(3)	Proposes to clarify that persons exercising the privileges of a glider or balloon rating are not required to hold a medical certificate.	Neutral	No Action – No change, clarifies existing regulation that balloon and glider pilots do not need medicals.

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11	§ 61.23(b)(7)	Proposes that no medical certificate requirement for Examiners who are administering practical tests in a glider, balloon, flight simulator, or flight training device.	Positive	Support Change – Allows DPE’s to not have to hold a medical when conducting practical tests in gliders, balloons, flight simulators and flight training devices. Should allow for more DPE’s in these areas.
12	§ 61.23(b)(8)	Clarifies the no medical certificate requirement when taking a practical test in a glider, balloon, flight simulator, or flight training device.	Neutral	No Action – Adds balloon and glider to list of practical tests that do not require a medical. Both were intended but left off during the previous rule change. The FAA has not required a medical for either as a matter of practice.
13	§ 61.23(b)(9)	Adds a provision excusing U.S. military pilots from obtaining a FAA medical certification, provided they hold a current medical examination from a medical facility of a U.S. Armed Forces and the flight does not involve a flight in air transportation service under parts 121, 125, or 135 of this chapter.	Positive	Support Change – Allows military pilots to use a military medical when exercising an FAA certificate outside of Part 121, 125 or 135. Previously they needed an FAA medical to exercise privileges of FAA certificates.
14	§ 61.29(d)(3)	Deletes the requirement that a person furnish their social security number.	Positive	Support Change – By law, the FAA cannot require a person to furnish their Social Security number.
15	§ 61.31(d)(1) § 61.31(d)(2) § 61.31(d)(3)	Makes minor editorial change by deleting § 61.31(d)(2). When the FAA initially proposed § 61.31(d), it was considering coining a new phrase that was to be known as “supervised PIC flight” that would allow a PIC who was in training to act as PIC of an aircraft if properly supervised by the person’s flight instructor. The “supervised PIC flight” concept was not adopted in the final rule, but subparagraph (d)(2) erroneously remained in the final rule.	Neutral	No Action
16	§ 61.31(l)	Establish training for operating with night vision goggles. Proposal requires ground and flight training and a one-time instructor endorsement to act as a PIC during NVG operations. Also, the FAA proposes to “grandfather” those PICs who previously qualified as a PIC for NVG operations under § 61.31(k).	Undetermined	– Need more information from users of NVG to determine impact

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17	§ 61.35(a)(2) (iv)	Proposal clarifies that when a person's permanent mailing address is a P.O. Box, the person must show proof of their current residential address at the time of application for a knowledge test	Neutral	No Action – matches existing requirements
18	§ 61.39(b)(2)	Deletes the word “scheduled” that appears in front of the phrase “U.S. military air transport operations” under § 61.39(b)(2) because there is no such thing as “scheduled” U.S. military transport operations.	Neutral	No Action
19	§ 61.39(c)(2)	Existing § 61.39(c)(2) incorrectly suggests that an endorsement is not required for an applicant for an aircraft class rating. Thus, the FAA is proposing to amend § 61.39(c)(2) by removing the phrase “or a class rating with an associated type rating” to clarify that they <i>are not excepting</i> applicants for an aircraft type rating from obtaining an endorsement from an authorized instructor.	Neutral	No Action – Clarifies a requirement for an instructor endorsement when applying for an aircraft class rating.
20	§ 61.39(d) & (e)	Proposes to change the phrase “60 calendar days” in § 61.39(d) and (e) to read “2 calendar months” to make it simpler to calculate the time for when a segmented practical test must be completed. An applicant who accomplishes a segmented practical test would be required to complete the entire practical test within 2 calendar months after the applicant began the test. For example, an applicant who began the oral portion of the practical test on July 2, 2006, would have to complete the remaining portions of the practical test before the end of September 2006.	Positive	Support Change – Actually allows more time to complete an unfinished practical test.
21	§ 61.43(a) and (b)	Clarify when single pilot performance is required on the practical test vs. permitting issuance of the “second in command” limitation. Proposes to clarify when an applicant can perform the practical test as a single pilot or use a second in command. If a second in command pilot is used the limitation “Second in Command Required” would be placed on the applicant's pilot certificate.	Neutral	No Action
22	§ 61.45(a)(2) (iii)	Proposes to disallow the use of surplus military aircraft with no U. S. equivalent type certificates for the taking of practical tests.	Undetermined	– Not sure of who or how this impacts or if this is an issue we should comment on.

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23	§ 61.45(c)	Except gliders from the requirement that aircraft used for a practical test must have engine power controls and flight controls that are easily reached and operable in a conventional manner by both pilots.	Neutral	No Action
24	§ 61.51(b)(3)(iv)	Add a provision for logging night vision goggle time.	Undetermined	– Need more information from users of NVG to determine impact
25	§ 61.51(e)(1)	Corrects an omission and permits airline transport pilots (ATPs) to log pilot-in-command (PIC) flight time. To avoid confusion, the FAA proposes to add the words “airline transport pilot” to § 61.51(e)(1).	Positive	Support Change – Clarifies existing regulations.
26	§ 61.51(e)(1)(iv)	Permit a pilot who is performing the duties of PIC while under the supervision of a qualified PIC to log PIC time. The purpose for this proposal is to provide another way for holders of a commercial pilot certificate or airline transport pilot certificate to log PIC time.	Undetermined	- We need to hear from those impacted to determine if we need to comment.
27	§ 61.51(b)(1)(iv) § 61.51(b)(2)(v) § 61.51(b)(3)(iii) § 61.51(g)(4)	Revise the instructions for logbook entries to include personal computer aviation training device (PCATD). Clarify use of flight simulator, flight training device, PCATD to conform to current practice and require that an instructor be present to observe the session and sign the person’s logbook.	Positive*	Support Change *AOPA Comment – Comment on proper use of definition. Also clarifies existing policy that instructor must be present and sign logbook to count time.
28	§ 61.51(j)	Establish that an aircraft must hold an airworthiness certificate, with some exceptions, for a pilot to log flight time to meet the certificate, rating, or recent flight experience requirements under part 61. Codifies existing policy that does not allow the logging of time in surplus military aircraft that do not have civilian equivalent.	Undetermined	- We need to hear from those impacted to determine if we need to comment. May impact the warbird community or other operating surplus military aircraft.
29	§ 61.51(k)	Add the criteria and standards for logging night vision goggle time.	Undetermined	– Need more information from users of NVG to determine impact

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30	§ 61.57(c)(1) § 61.57(c)(2) -(5) § 61.57(c)(6)	<p>Proposes to amend the instrument flight experience tasks and iterations and to allow use of PCATD, flight simulators (FS), and flight training devices (FTD) for maintaining instrument recent flight experience.</p> <p>The instrument flight experience and iterations must include at least: Six instrument approaches consisting of both precision and non-precision approaches; One complete holding pattern at a radio station and one complete holding pattern at an intersection or waypoint; and One hour of simulated cross-country practice operation that involves intercepting and tracking courses through the use of navigation systems while performing a takeoff phase, area departure phase, enroute phase, area arrival phase, approach phase, and a missed approach phase of flight.</p> <p>Proposes a person could use an FS or FTD exclusively by performing and logging at least 3 hours of instrument recent flight experience within the 6 calendar months before the date of the flight.</p> <p>Proposes a person could use a PCATD exclusively by having performed and logged at least 3 hours of instrument recent experience within the 2 calendar months before the date of the flight. Proposes a person could combine use of the aircraft and an FS, FTD, or PCATD to obtain instrument experience. When a pilot elects to combine use of an aircraft and a simulation device, requires completion of one hour of instrument flight time in the aircraft and 3 hours in the FS, FTD, or PCATD within the preceding 6 calendar months.</p>	Negative*	<p>Oppose Change - Allows for use of PCATD, flight simulators and flight training devices.</p> <p>AOPA Comment - we have significant issues with the proposed instrument flight experience requirements including the one hour cross country, holding on a radio station and the addition of an hour requirement when using simulator, FTD or combination of aircraft and simulator or FTD.</p>
31	§ 61.57(d)	Clarify when an instrument proficiency check must be completed to serve as the PIC under IFR or in weather conditions less than the minimums prescribed for VFR.	Neutral	- Clarifies without modifying existing requirement
32	§ 61.57(f)	Add a night vision goggle recent operating experience requirement to remain PIC qualified for night vision goggle operations.	Undetermined	– Need more information from users of NVG to determine impact

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33	§ 61.57(g)	Add a night vision goggle proficiency check requirement to remain PIC qualified for night vision goggle operations.	Undetermined	– Need more information from users of NVG to determine impact
34	§ 61.59(a)-(c)	This proposal would standardize the language in this chapter on falsification, reproduction, and alteration of applications, certificates, logbooks, reports, and records for the purposes of simplicity and clarity.	Negative	Oppose Change – AOPA conducting legal review to determine full impact May go beyond existing regulation and penalize for unintentional errors.
35	§ 61.63 § 61.63(c)(4) § 61.63(d)(5) § 61.63(e) § 61.63(f) § 61.63(g) § 61.63(h)	Change the title to read “Additional aircraft ratings (other than for ratings at the airline transport pilot certificate level).” Clarify what is intended for those applicants who hold only a lighter than air (LTA)-Balloon rating and who seek a LTA–Airship rating. Add a provision in subparagraph (5) to account for aircraft not capable of instrument flight. Parallels proposed § 61.157(b)(3). Amend the requirements for permitting use of aircraft not capable of instrument flight for a rating.	Neutral	No Action
36	§ 61.64 § 61.64(a) and (b) § 61.64(a)(2) (i) & (ii) § 61.64(c) and (d) § 61.64(c)(2) (i) & (ii) § 61.64(e) and (f) § 61.64(e)(2) (i) & (ii)	Place the existing regulations that address the requirements for using flight simulators and flight training devices into proposed § 61.64 Simplify and amend the requirements and limitations for use of a flight simulator or flight training device for an airplane rating.	Positive*	Support Change *AOPA Comment – with clarifying comments on wording and terminology regarding flight simulators, flight training devices and PCATDs.

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37	§ 61.65(d) § 61.65(e) § 61.65(f) § 61.65(g)	The FAA proposes to amend § 61.65 to conform the FAA’s instrument rating cross-country time requirements as PIC with the corresponding International Civil Aviation Organization (ICAO) requirements. Proposed changes would address the aeronautical experience and training for the instrument-airplane, helicopter, and powered-lift ratings. Currently, § 61.65(d)(1) merely states “At least 50 hours of cross-country flight time as pilot in command, of which at least 10 hours must be in airplanes for an instrument—airplane rating.” It does not account for the instrument-helicopter rating or the instrument-powered-lift rating.	Negative	Oppose Change – Modifies the instrument helicopter time requirement to meet ICAO. Adds requirement for 10 hours of cross-country flight time in a helicopter which can be very costly.

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38	§ 61.65(h)	<p>Permit the use of a PCATD to be used for 10 hours of instrument time. The FAA proposes to amend § 61.65 by adding paragraph (h), which would allow 10 hours of instrument training for the instrument rating to be performed on a PCATD. The instrument training may be given by the holder of a ground instructor certificate with an instrument rating or by a holder of a flight instructor certificate with an instrument rating appropriate to the instrument rating sought. The 10 hours of instrument training given in a PCATD would be included in the 20 hours of instrument training allowed to be performed in a flight simulator or a flight training device under proposed § 61.65(e).</p> <p>For a PCATD to be used for instrument training under proposed § 61.65, the PCATD, instrument training, and instrument tasks would have to be approved by the FAA. The instrument training on a PCATD would have to be provided by an authorized instructor. For a person to receive the maximum 10 hours of credit in a PCATD, the person may not have logged and be credited for more than 10 hours of instrument training in a flight simulator or flight training device. A view-limiting device would have to be worn by the applicant when logging instrument training in the PCATD. The instrument training and instrument tasks that may be approved for performance on a PCATD would be listed in proposed § 61.65(f). The FAA specifically requests comments on whether, and to what extent, we should allow use of a PCATD for providing instrument training for the instrument rating.</p>	Negative*	<p>Oppose Change – PCATDs have been replaced by Basic Aviation Training Devices (BATD) and Advanced Aviation Training Devices (AATD). Currently, AATDs allow for 20 hours of instrument training to be credited towards an instrument rating. BATDs qualify for 10 hours. This section needs to reflect this.</p> <p>*AOPA Comment – remove requirement for a view limiting device when using a PCATD.</p>
39	§ 61.69(a)(4)	Correct typographical error involving the word “or.”	Neutral	No Action
40	§ 61.69(a)(6)	Increase the recent flight experience requirements for tow pilots from 12 months to 24 months	Positive	<p>Support Change – Minimal impact to majority of members but nice benefit for glider community.</p>

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41	§ 61.73(b) § 61.73(c) § 61.73(d) § 61.73(e) § 61.73(f)	Allows military pilots who are off active flight status beyond 12 years to apply for FAA certificates. Also allows those with other than PIC military time to apply for FAA certificates.	Positive	Support Change – Allows for more retiring military to obtain FAA credentials.
42	§ 61.73(g)	Allow issuing FAA flight instructor certificates and ratings to military instructor pilots who graduate from a U.S. military instructor pilot school with an instructor pilot qualification.	Positive	Support Change – Allows for more instructors and ones that have experience.
43	§ 61.73(h)	Proposal to clarify, simplify, and list the documents required for proving rated U.S. military pilot status to qualify for FAA pilot certification.	Positive	Support Change – Makes easier for transition from military to FAA.
44	§ 61.75(a) § 61.75(b)	Require foreign pilot license to be at the level of private pilot certificate or higher to be issued a U.S. private pilot certificate.	Neutral	No Action
45	§ 61.75(b)(3)	Add “other than a U.S. student pilot certificate.”	Neutral	No Action
46	§ 61.75(c)	Add the qualifier “for private pilot privileges only” to clarify issuance of U.S. private pilot certificates based on foreign pilot licenses.	Neutral	No Action
47	§ 61.75(e) § 61.75(e)(1) § 61.75(e)(4) § 61.75(f) § 61.75(g)	Correct an error: where the rule states “U.S. private pilot certificate,” it should state “U.S. pilot certificate.”	Neutral	No Action
48	§ 61.77(a)(2) § 61.77(b)(1) § 61.77(b)(5)	Clarify who can be issued a special purpose pilot authorization. Delete a requirement that an applicant have documentation of meeting the recent flight experience requirements of part 61 to be issued a special purpose pilot authorization.	Undetermined	- Need more information on who this impacts.
49	§ 61.96(b)(9)	Require an applicant for a recreational pilot certificate to hold a student pilot certificate.	Neutral	No Action
50	§ 61.101(e)(1)(iii)	Proposal to allow recreational pilot certificate holders to act as PIC in rotorcraft with more than a 180 horsepower powerplant.	Positive	Support Change – Limited benefit to rotorcraft community.
51	§ 61.103(j)	Proposal that a person must hold either a student pilot certificate or a recreational pilot certificate to apply for a private pilot certificate.	Neutral*	Clarifies existing requirements, * AOPA Comment - need to also include sport pilot.

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52	§ 61.109(a)(5)(ii) § 61.109(b)(5)(ii) § 61.109(e)(5)(ii)	The FAA proposes to standardize use of the term “cross-country” throughout part 61. Under § 61.109(a)(5)(ii), (b)(5)(ii), and (e)(5)(ii), the regulations erroneously state, “of at least 50 nautical miles” (emphasis added). The proposal amends all definitions of “cross-country” to read “more than 50 nautical miles.”	Negative*	Oppose Change – Impacts flight schools that have airports exactly 50 nautical miles currently authorized to use. *AOPA recommendation: change the definition of cross country in 61.1(b)(3)(ii) to “of at least 50 nautical miles” to standardize.
53	§ 61.109(c)(4)(ii)	Change the distance on a cross-country flight for private pilot certification – helicopter rating from “at least 25 nautical miles” to read “more than 25 nautical miles” to conform to ICAO requirements.	Negative	Oppose Change – Impacts rotorcraft flight schools that have airports exactly 25 nautical miles currently authorized to use.
54	§ 61.109(d)(5)(ii)	Change the distance on a cross-country flight for private pilot certification – gyroplane rating from “at least 25 nautical miles” to read “more than 25 nautical miles” to conform to ICAO requirements.	Negative	Oppose Change – Impacts gyroplane flight schools that have airports exactly 25 nautical miles currently authorized to use.
55	§ 61.127(b)(4)(vi)	Add “ground reference maneuvers” as an area of operation for commercial pilot certification – gyroplane rating.	Neutral	No Action
56	§ 61.127(b)(5)(vii)	Delete “ground reference maneuvers” for commercial pilot certification powered lift rating.	Neutral	No Action
57	§ 61.129(a)(3)(i)	Proposing to clarify the tasks required for “instrument aeronautical experience” for the airplane single-engine rating at the commercial pilot certification level. Under this proposal, “instrument aeronautical experience” would include at least “10 hours of instrument training, of which at least five hours must be in a single-engine airplane and must include training using a view-limiting device for attitude instrument flying, partial panel skills, recovery from unusual flight attitudes, and intercepting and tracking navigational systems.”	Neutral*	*AOPA Comment – must also allow for combination of actual instrument time as well as use of a view limiting device.

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58	§ 61.129(b)(3)(i)	Proposing to clarify the tasks required for “instrument training” for the airplane multiengine rating at the commercial pilot certification level. This proposal would include at least “10 hours of instrument training, of which at least five hours must be in a multiengine airplane and must include training using a view limiting device for attitude instrument flying, partial panel skills, recovery from unusual flight attitudes, and intercepting and tracking navigational systems.”	Neutral*	*AOPA Comment – must also allow for combination of actual instrument time as well as use of a view limiting device.
59	§ 61.129(c)(3)(i)	Proposal to allow use of a flight simulator, flight training device, or PCATD for some of the instrument training required for commercial pilot certification - helicopter rating. Proposal would allow the instrument training that is required for the helicopter rating at the commercial pilot certification level to be performed in an aircraft, flight simulator, flight training device, or PCATD. The instrument training would include at least “5 hours of instrument training and must include training using a view limiting device for attitude instrument flying, partial panel skills, recovery from unusual flight attitudes, and intercepting and tracking navigational systems.”	Negative*	Oppose Change – Adds requirement for 5 hours on the control and maneuvering of a helicopter solely by reference to instruments. *AOPA Comment – while change does allow for use of flight simulator, flight training device, or PCATD, this new requirement for 5 hours in helicopter creates burden for those with VFR equipped helicopter and no access to FS, FTD or PCATD. Must also allow for combination of actual instrument time as well as use of a view limiting device.
60	§ 61.129(d)(3)(i)	Reduce the instrument training for commercial pilot certification – gyroplane rating to 2.5 hours on the control and maneuvering of a gyroplane solely by reference to instrument and permit it to be conducted in an aircraft, flight simulator, or flight training device. Clarify the control and maneuvering of a gyroplane solely by reference to instrument required for commercial pilot certification gyroplane rating must include training using a view-limiting device.	Neutral*	*AOPA Comment - Must also allow for combination of actual instrument time as well as use of a view limiting device.
61	§ 61.129(e)(3)(i)	Require that instrument training tasks for commercial pilot certification - powered-lift rating must include training using a view-limiting device.	Neutral*	*AOPA Comment - Must also allow for combination of actual instrument time as well as use of a view limiting device.

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62	§ 61.129(a)(3)(iii) § 61.129(a)(3)(iv) § 61.129(b)(3)(iii) § 61.129(b)(3)(iv) § 61.129(c)(3)(i) § 61.129(c)(3)(ii) § 61.129(c)(3)(iii) § 61.129(d)(3)(ii) § 61.129(e)(3)(ii) § 61.129(e)(3)(iii) § 61.129(g)(4)(ii) & (iii)	Allow the day and night cross-country flights for commercial pilot certification single-engine & multiengine airplane, helicopter, gyroplane, powered lift and airship ratings to be performed under visual flight rules (VFR) or instrument flight rules (IFR). Reduce the hour requirements on the control and maneuvering of a helicopter solely by reference to instruments from 10 hours to 5 hours for commercial pilot certification-helicopter rating and permit it to be performed in an aircraft, flight simulator, or flight training device. Clarify the control and maneuvering of a helicopter solely by reference to instruments required for commercial pilot certification for the helicopter rating must include training using a view-limiting device.	Positive*	Support Change *AOPA Comment – Should also clarify that the flights can be done in IMC as well as under IFR.
63	§ 61.129(d)(3)(iii)	Delete the requirement for a cross-country flight at night time for commercial pilot certification – gyroplane rating and establish it as “At least two hours of flight training during night-time conditions in a gyroplane at an airport, that includes 10 takeoffs and 10 landings to a full stop (with each landing involving a flight in the traffic pattern).”	Neutral	No Action
64	§ 61.129(a)(4) § 61.129(c)(4) § 61.129(d)(4) § 61.129(e)(4) § 61.129(g)(2)	The FAA proposes to allow the commercial pilot certification aeronautical experience to be conducted either solo or while performing the duties of PIC with an instructor on board. Therefore, the FAA proposes to allow commercial pilot certification for the single-engine airplane, helicopter, gyroplane, powered-lift, and airship ratings to be performed either solo or while performing the duties of PIC with an authorized instructor aboard.	Positive*	Support Change *AOPA Comment – We support this change but feel the FAA should only require the time to be PIC thus allowing for it to be dual received from an instructor or PIC with passengers. This would allow the flight to be accomplished as part of other flights authorized for private pilots thus reducing the financial impact with no loss of safety.
65	§ 61.129(g)(3)	Clarify the instrument training tasks for commercial pilot certification – airship rating require instrument training using a view-limiting device.	Neutral*	*AOPA Comment - Must also allow for combination of actual instrument time as well as use of a view limiting device.

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66	§ 61.153(d)(3)(i), (ii)	Further clarify the additional condition to qualify for a U.S. ATP certificate on the basis of a foreign pilot certificate.	Neutral	No Action
67	§ 61.157 § 61.157(b) § 61.157(g) § 61.157(h) § 61.157(i) § 61.157(g)	Proposal to move the provisions for use and limitations of a flight simulator and flight training device from the ATP flight proficiency requirements of § 61.157 to the new proposed § 61.64 and to make other clarifying revisions.	Neutral	No Action – Addressed in comments to change 36.
68	§ 61.157(h)	Adds a provision to permit an applicant for type rating in a multiengine, single seat airplane to be performed in a multi-seat version of that type airplane, or the examiner must be in a position to observe the applicant during the practical test.. Parallels proposed § 61.63(f).	Undetermined	- Need more information on who this impacts.
69	§ 61.157(i)	Adds a provision to permit an applicant for type rating in a single engine, single seat airplane to be performed in a multi-seat version of that type airplane, or the examiner must be in a position to observe the applicant during the practical test.. Parallels proposed § 61.63(g).	Undetermined	- Need more information on who this impacts.
70	§ 61.159(c)(3)	Add a provision to accommodate the crediting of flight engineer time for U.S. military flight engineers for qualifying for an ATP certificate that is similar to what is provided for crediting flight engineer time under part 121.	Positive	Support Change
71	§ 61.159(d) § 61.159(e)	Clarify when an applicant may be issued an ATP certificate with the ICAO endorsement. Clarify a holder of an ATP certificate with the ICAO endorsement may have the endorsement removed after meeting the aeronautical experience of proposed § 61.159(d)	Neutral	No Action
72	§ 61.187(b)(6)(vii)	Delete the “go around maneuver” for flight instructor certification for the glider rating.	Positive	Support Change

Proposal No.	Regulations Changed	Summary of Proposed Changes	Potential Impact Positive Negative Neutral Undetermined	AOPA Position
73	§ 61.195(c)(1) & (2)	Proposal to establish flight instructor qualifications for providing instrument training in flight at the commercial pilot and ATP certification levels. The FAA proposes to amend § 61.195(c) to establish that a flight instructor who provides instrument training required at the commercial pilot and airline transport pilot certification levels must hold an instrument rating on both his or her pilot and flight instructor certificates that are appropriate to the category and class of aircraft in which instrument training is being provided.	Negative	Oppose Change – Instrument ratings on flight instructor certificates are not class specific thus the FAA should not include “class” in this regulation.
74	§ 61.195(d)(3)	Delete requirement that a flight instructor must sign a student’s certificate for authorizing solo flight in Class B airspace.	Positive	Support Change – minor benefit, still have requirement to endorse log book. Deletes duplicate endorsement requirement.
75	§ 61.195(k)	Add flight instructor qualifications for giving the PIC night vision goggle qualification and currency training.	Undetermined	- Need more information from users of NVG to determine impact
76	§ 61.215(b)	Delete the privilege of AGIs to provide training and endorsement for instrument training.	Negative*	Oppose Change *AOPA Comment – The proposed change should “grandfather” existing holders of Advanced Ground Instructor certificates and allow them to continue to provide instrument instruction since this was an error by the FAA. A fall back would be to “grandfather” existing holders of Advanced Ground Instructor certificates who hold an instrument rating on their pilot or flight instructor certificates.
77	§ 61.217(a) – (d)	Establish new currency requirements for ground instructors.	Undetermined	- Need input from ground instructors.
78	§ 91.205(i)	Establish the required instruments & equipment for night vision goggle operations.	Undetermined	- Need more information from users of NVG to determine impact

Proposal No.	Regulations Changed	Summary of Proposed Changes	Potential Impact Positive Negative Neutral Undetermined	AOPA Position
79	§ 141.5(a) – (e)	Clarify that the “counters” for the pass rate must be 10 different people and that no one graduate can be counted more than once.	Negative	Oppose Change – The FAA should consider the graduates of individual programs as separate counters regardless if they are the same person. The courses are different and approved separately so there is no basis for the FAA’s proposed changes.
80	§ 141.9	The FAA has found it necessary to revise the language because some have misunderstood the rule and believe that when the FAA issues examining authority to a pilot school, it authorizes examining authority for all the training courses of that school. This is not true. The FAA provides examining authority on a course-by-course basis.	Neutral	No Action
81	§ 141.33(d)(2)	Reduce the number of student enrollments to 10 students to qualify for a check instructor position.	Positive	Support Change
82	§ 141.39	Permit the use of foreign registered aircraft for those part 141 training facilities that are located outside of the United States and where the training is conducted outside of the United States.	Positive	Support Change
83	§ 141.53(c)(1)	Delete subparagraph (c)(1) to remove an obsolete date.	Neutral	No Action
84	§ 141.55(e)(2)(ii)	Correct the phrase “the practical or knowledge test, or any combination thereof” because it should state “the practical or knowledge test, as appropriate”	Neutral	No Action
85	§ 141.77(c)(1), (2), and (3)	Make a technical correction to the language in the rules about the proficiency and knowledge test required for transfer students to a part 141 pilot school.	Undetermined	- Need input from 141 schools regarding this change.
86	§ 141.85(a)(1) & (d)	Clarify duties and responsibilities that chief instructor may delegate to an assistant chief instructor and recommending instructor.	Positive	Support Change

Proposal No.	Regulations Changed	Summary of Proposed Changes	Potential Impact Positive Negative Neutral Undetermined	AOPA Position
87	141 Appendix B. 2.	Under the current rules, the FAA requires a person hold at least a recreational or student pilot certificate before enrolling in the <u>flight portion</u> of the private pilot certification course. This means that a person must complete his or her medical licensing before beginning flight training. The FAA is proposing that under part 141, appendix B, paragraph 2, a person is required to hold a recreational or student pilot certificate to begin the solo phase of the private pilot certification course but not for the flight portion of the certification course.	Positive*	Support Change *AOPA Comment – add “or sport pilot”.
88	141 Appendix B. 4(b)(1)(i) B. 4(b)(2)(i) B. 4(b)(5)(i)	In the private pilot certification - single-engine & multiengine, airplane, and powered lift courses, change the training required to “on the control and maneuvering of a XXX solely by reference to instruments” instead of calling it “instrument training.”	Positive	Support Change – Allows for non-instrument rated instructor to give the training.
89	141 Appendix B. 5(a)(1)	Change the distance on a cross-country flight in the private pilot certification – airplane single-engine course from “at least 50 nautical miles” to “more than 50 nautical miles.”	Negative*	Oppose Change – Impacts flight schools that have airports exactly 50 nautical miles currently authorized to use. *AOPA recommendation: change the definition of cross country in to “at least 50 nautical miles” to standardize.
90	141 Appendix B. 5(b)(1)	Change the distance on a cross-country flight in the private pilot certification – airplane multiengine course from “at least 50 nautical miles” to “more than 50 nautical miles.”	Negative*	Oppose Change – Impacts flight schools that have airports exactly 50 nautical miles currently authorized to use. *AOPA recommendation: change the definition of cross country in to “at least 50 nautical miles” to standardize.
91	141 Appendix B. 5(c)(1)	Change the distance on a cross-country flight in the private pilot certification - helicopter course to conform to ICAO requirements which require a cross-country flight of at least 100 nautical miles. Change the phrase “at least 25 nautical miles” to “more than 25 nautical miles.”	Negative	Oppose Change – Impacts rotorcraft flight schools that have airports exactly 25 nautical miles currently authorized to use. Also adds additional 25 miles to cross country requirement to meet ICAO standards.

Proposal No.	Regulations Changed	Summary of Proposed Changes	Potential Impact Positive Negative Neutral Undetermined	AOPA Position
92	141 Appendix B. 5(d)(1)	Change the distance on a cross-country flight in the private pilot certification – gyroplane course from “at least 25 nautical miles” to “more than 25 nautical miles.”	Negative	Oppose Change – Impacts rotorcraft flight schools that have airports exactly 25 nautical miles currently authorized to use.
93	141 Appendix B. 5(e)(1)	Change the distance on a cross-country flight in the private pilot certification – powered lift course from “at least 50 nautical miles” to” more than 50 nautical miles.”	Negative*	Oppose Change – Impacts flight schools that have airports exactly 50 nautical miles currently authorized to use. *AOPA recommendation: change the definition of cross country in to “at least 50 nautical miles” to standardize.
94	141 Appendix C. 4(b)(5) & (6)	Allow approval of instrument rating courses that give credit for instrument training on a PCATD.	Positive*	Support Change 8AOPA Comment – delete requirement for view limiting device when using a PCATD.
95	141 Appendix D. 5(a), (c), (d), & (e)	Allow training to be performed solo or with an instructor onboard for the commercial pilot certificate courses.	Positive*	Support Change *AOPA Comment – We support this change but feel the FAA should only require the time to be PIC thus allowing for it to be dual received from an instructor or PIC with passengers. This would allow the flight to be accomplished as part of other flights authorized for private pilots thus reducing the financial impact with no loss of safety.

Proposal No.	Regulations Changed	Summary of Proposed Changes	Potential Impact Positive Negative Neutral Undetermined	AOPA Position
96	141 Appendix D. 4(b)(1)(iii) D. 4(b)(1)(iv) D. 4(b)(2)(i) D. 4(b)(2)(iii) D. 4(b)(2)(iv) D. 4(b)(3)(ii) D. 4(b)(3)(iii) D. 4(b)(4)(ii) D. 4(b)(5)(ii) D. 4(b)(5)(iii) D. 4(b)(7)(ii) D. 4(b)(7)(iii)	Allow the day and night cross-country flights for commercial pilot certification single-engine & multiengine airplane, helicopter, gyroplane, powered lift and airship ratings to be performed under visual flight rules (VFR) or instrument flight rules (IFR).	Positive*	Support Change *AOPA Comment – Should also clarify that the flights can be done in IMC as well as under IFR.
97	141 Appendix D. 4(b)(4)(iii)	Require a night time cross-country flight in the commercial pilot certificate - gyroplane course to include at least two hours of flight training during night-time conditions at an airport, that includes 10 takeoffs and 10 landings to a full stop (with each landing involving a flight in the traffic pattern).	Neutral	No Action
98	141 Appendix D. 4(d)(4)(vi)	Add “ground reference maneuvers” as an area of operation for the gyroplane rating in the commercial pilot certificate course.	Neutral	No Action
99	141 Appendix D. 4(b)(1)(ii)	Allow the complex airplane training in the commercial pilot certificate - single-engine airplane course to be performed in either in a single-engine complex airplane or multiengine complex airplane.	Positive*	Support Change *AOPA Comment – FAA should also include this for Part 61 as well.
100	141 Appendix D. 4(b)(1)(i) D. 4(b)(3)(i) D. 4(b)(4)(i) D. 4(b)(5)(i) D. 4(b)(7)(i)	Require that the instrument training tasks for the commercial pilot certification - airplane single-engine, helicopter, gyroplane, powered-lift and airships courses include training using a view-limiting device.	Negative*	Oppose Change *AOPA Comment - Must also allow for combination of actual instrument time as well as use of a view limiting device.
101	141 Appendix E. 2	Requires a person prior to having completed the flight portion of the ATP course to have met the ATP aeronautical experience requirements of part 61, subpart G.	Undetermined	- Need input from 141 schools regarding this change.

Proposal No.	Regulations Changed	Summary of Proposed Changes	Potential Impact Positive Negative Neutral Undetermined	AOPA Position
102	141 Appendix I. 3 and 4	Clarify the amount and content of ground and flight training for the add-on aircraft category and/or class rating courses in the recreational, private, commercial, and ATP certification courses.	Undetermined	- Need input from 141 schools regarding this change.