

Date: August 13, 2008

Subject: Response to FAA-2007-29015

The United States Ultralight Association would like to comment on your "proposal #16" of the NPRM, as follows:

16. Remove expired ultralight transition provisions and limit the use of aeronautical experience obtained in ultralight vehicles

The United States Ultralight Association (USUA) agrees with removing the expired text of the various regulations dealing with the "transition periods" which have expired. However, USUA opposes the proposed change to 14 CFR 61.52, which would place an end date of 1/31/2012 on the use of ultralight time toward the aeronautical experience requirements of Sport Pilot, and Sport Pilot Instructor.

Although the former "ultralight training exemptions" have expired, we believe that there is still a need to allow ultralight pilots who are registered with an ultralight organization to be able to use their properly logged experiences toward a Sport Pilot or Sport Pilot Instructor certificate. There are many ultralight pilots who are properly registered with an ultralight organization (per 61.52) who could still benefit by allowing their flight time, solo time, and even cross country time to count toward Sport Pilot.

Therefore, we recommend that no deadline be imposed on the on the use of ultralight time toward the aeronautical experience requirements of Sport Pilot, and Sport Pilot Instructor.

Signed,

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