conducted a training experiment to examine the relationship of pilot experience, as defined by total flight time, to the acquisition of instrument skills. The results of that experiment concluded that the: (1) Amount of prior flight time had no effect on the acquisitions and demonstration of instrument flight skills within the preinstrument flight experience ranges examined in connection with the experiment; and (2) reduction of the former required total flight experience, prior to the issuance of Amendment No. 61-75, for an instrument rating to a lower total flight experience encouraged pilots to obtain their instrument ratings. In light of the ever increasing complex NAS that pilots are required to operate in, it should encourage pilots to start their instrument training as soon as possible.

In Amendment No. 61–75, the FAA cited a 1981 study conducted by Walton Graham, "A Study of General Aviation Safety," part II, Volume 1, prepared for Trans Urban East Organization, New York, by Questek, Inc., November 1981. In that study, the FAA noted the following accident rates:

Fatal/Serious Accident Rates, IFR Rated Pilots Compared to Non-IFR Rated Pilots

Flight Under IFR Conditions By:

Non-IFR Rated 1 Acc./1,449 hours Plt.

IFR Rated Plt ..... 1 Acc./12,186 hours Flight Under VFR

Conditions By:

Non-IFR Rated 1 Acc./61,900 hours

IFR Rated Plt ..... 1 Acc./94,819 hours

The FAA stated the statistics in that study supported the need for Amendment No. 61–75. As in the case of Amendment No. 61–75, the FAA believes this proposal will encourage non instrument-rated pilots to seek instrument training at an earlier stage in their aviation training, and will result in:

(1) A higher level of safety and competency in coping with sophisticated aircraft equipment, navigation aids, and communication systems;

(2) The restructuring of flying courses under parts 61 and 141 to provide supervised instrument flight rule experience during the training curriculum; and

(3) The encouragement of continued training to meet both the currency and higher certification levels.

The proposal would continue to require at least 40 hours of simulated or actual instrument flight training, which may include 20 hours in an approved

flight simulator or flight training device and 15 hours of instrument flight training in the aircraft for an instrument rating.

Proposed § 61.65 also would state that a person who completes an instrument rating practical test for a multiengine airplane, while holding a single-engine airplane class rating would be considered to have met the singleengine airplane instrument rating requirements. The currently required flight instruction and skill would be addressed under proposed areas of operation. A significant proposed change for airplanes is that proposed § 61.65 would add a requirement that the 250-nautical mile (nm) IFR crosscountry flight contain one route greater than 100 nm between airports, and that this cross-country flight include an instrument approach at each airport. However, the proposal would delete the language in the current rule that requires the cross-country flight to be in ''simulated or actual IFR conditions.' The FAA intends that the flight be conducted under instrument flight rules but not necessarily under actual or simulated instrument conditions. An instrument approach would be required at each airport, and approaches using VOR, NDB, and ILS radio navigation aids would be required during the flight.

Similarly, for the instrument ratinghelicopter, the cross-country requirement would be 100 nm under IFR but not necessarily simulated or actual instrument conditions. The proposal would add the requirement that one of the routes be greater than 50 nm between airports, and that an instrument approach be conducted at each airport on the route.

The requirements of the proposed areas of operation would be very similar to the current requirements, although in certain cases they would be more general. For example, the requirement that the applicant be endorsed as having been trained and found competent in instrument approaches to published minimums using VOR, ADF, and ILS systems would be replaced with a requirement that the applicant receive and log training in instrument approach procedures. This would permit the PTS to specify, as required, other types of approach procedures appropriate to the IFR environment.

The instrument rating areas of operation are listed separately by aircraft. Although this causes some redundancy, it is similar to the organization of the current regulation, and is intended to assist users by eliminating or minimizing cross-referencing. The proposed rule contains areas of operation for airplane category

(the practical test would vary between single-engine and multiengine), helicopter class, airship class, and powered-lift category.

Applicants for the instrument rating would be required to present endorsements for the knowledge and practical tests as well as pass the required knowledge test. The required areas of aeronautical knowledge would remain similar to the currently required areas of ground instruction, including applicable FAR, the "Airman's Information Manual," the air traffic control system, IFR navigation and approaches, IFR en route and approach procedure charts, aeronautical decision making and judgment, weather, and windshear avoidance.

## 33. Recreational Pilot Certificate

The FAA proposes to revise the eligibility requirements for the recreational pilot certificate as follows: (1) must be able to read, speak, write, and understand the English language, with no provisions or limitations to the contrary; and (2) would not be required to hold a medical certificate. In addition, an applicant would have to affix a signed and dated statement to the application certifying they do not have any known medical limitations that prevent the person from operating the aircraft for the aircraft category and class rating sought.

The FAA is proposing to allow holders of recreational pilot certificates and holders of a higher pilot certificate who elect to only exercise the privileges of a recreational pilot certificate to operate without holding medical certificates. This action is responsive to the EAA petition and the interests of the general aviation community, as discussed earlier. The FAA is requesting comments on this proposal and the accompanying proposed changes to § 61.53. For more details see the section-by-section analysis for § 61.53.

The FAA proposes to revise the aeronautical experience requirements for a recreational pilot certificate by requiring an applicant to accomplish and log at least 30 hours of flight time that includes at least 15 hours of flight training time from an authorized flight instructor and 3 hours of supervised PIC flight time. The purpose for this proposal is to respond to comments heard during the public hearings to allow the student and the flight instructor to tailor the required training to individual student needs.

For example, a student who has previous aviation experience and takes readily to the training may be able to complete training for a recreational pilot certificate with only the minimum 30