Docket Operations, M-30
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Room W12-140
West Building Ground Floor
Washington, DC 20590-0001

RE: FAA Docket Number FAA-2021-1040

December 31, 2021

To whom it may concern:

The following comments are submitted for consideration concerning Medical Certification Standards for Commercial Balloon Operations document ID FAA-2021-1040-0001.

The FAA is not proposing in this NPRM to extend third-class medical certification requirements to balloon operations during which flight instruction is conducted by an airman serving as PIC. However, the FAA has invited comment on this issue.

Since 1967, National Association of Flight Instructors (NAFI) has dedicated its efforts exclusively to "raising and maintaining the professional standing of the flight instructor in the aviation community." Since early 2019, NAFI has been proud to work in cooperation with the balloon industry experts at The Balloon Training Academy to create the "Elite Balloon Instructor program fueled by NAFI." The Elite Balloon Instructor Official Mission statement: "To differentiate between a commercial balloon pilot who is analogous to a CFI, and one who demonstrates the highest level of instructional activity, educational experience, and professional service while acting as an instructor."

In consideration of the above, NAFI is in agreement with the FAA's determination to not extend third-class medical certification requirements to balloon operations during which flight instruction is conducted by an airman serving as PIC. This is for the following reasons:

1. Accident data does not identify risk associated with balloon pilot training. There has only been one accident involving hot air balloon flight instruction in the last 20 years. That accident involved a high wind landing and the student improperly positioned for the high wind landing resulting in a broken ankle.

2. Balloons operate at slow speeds and the aircraft themselves are forgiving to collisions, therefore reducing risks to persons and property on the ground.

3. Balloons used in flight training are small balloons with no passengers (and no paying passengers), therefore no risk to the flying public.

4. Balloon training flights are conducted in less congested areas than commercial operations. Oftentimes over farm fields or desert, therefore less to no risk to the public on the ground.

5. Requiring medicals would drastically reduce the number of available instructors therefore increasing the barriers of entry and burden to become a balloon pilot.

NAFI looks forward to continuing to work with the ballooning community to raise and maintain the professional standing of the flight instruction community.

On behalf of the members of NAFI, thank you for your kind attention to this matter.

Sincerely,

Robert V. Meder
Chairman
National Association of Flight Instructors