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ISSUE PAPER

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14 CFR Parts 125 and 135 Review

EFFECTS OF REVISING PARTS 125, 135 AS IT APPLIES TO LARGE ALL CRAGO AIRCRAFT

Part 125 was implemented to prevent large aircraft from being operated, in other than common carriage, predominantly unregulated. Over the years the regulation has, for the most part, accomplished this.

One of our current concerns is from operations not originally envisioned. Most operators of large aircraft have been issued some form of deviation from the regulations. A lot of this has been accomplished at the local level. According to DOT/FAA N 8700.20, dated 04-18-2003, Operations Specifications have been issued that are contrary to Part 125. These Ops Specs and deviations should be reviewed.

One way to approach the regulation is to review and amend Part 125. This review should provide inclusion for operations not originally envisioned. Another approach is to rescind 125 and send the airplanes to other regulations. This will require major re-write of affected regulations. This is not necessary, as 125 operations have not proven to be a hazard to the public.

Part 135 is already capable of accepting larger aircraft and should be amended to accept them. Adapting verbiage from 125.247 would address the type of maintenance program used. Large airplane maintenance programs exceed the requirements imposed by 135. It doesn't matter if the airplane is on an AAIP or CAMP.

FAR 135 should be opened to large, all cargo aircraft. This change of regulation would enhance transportation to the public. By allowing large aircraft to participate in common carriage under Part 135 the public would benefit from lower cost, more readily available transportation.

The other approach is to re-write Part 121 to include all commercial operators. The regulation could be tiered from banner operators to flag carriers. This would be such a complex task I don't believe this workgroup is prepared for the undertaking. This type of change would require planning over a longer period of time.

I do not feel 125 operators are the problem. The regulations need to be brought up to date with the changes that have taken place. That does not necessarily mean 125 needs to be eliminated. We have a huge number of large airplane operators to consider. They are involved in everything from Museums to Corporations and everything in between.

In the public interest 135 should be expanded to include larger cargo aircraft. This can be done without compromising safety. This will also provide the operators with additional revenue sources to maintain their fleet.

In the final form large airplane operators could chose to operated under Parts 125, 135 or 121 depending on the type of flying the participate in. The automotive industry would still utilize mostly 125 carriers but could call a 135 operator for a mixed load. Small package businesses could utilize 135

airplanes for seasonal high demand and scheduled 121 operations could be conducted as they now are.

Sincerely,

Robert A. Steenbock
Vice President