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DEPT. OF TRANSPORTATION
DOCKET SECTION
98 SEP 24 AM 1:41



U.S. Dept. of Trans. Dockets
No. FAA-98-4390 - 11
400 7th St. Southwest
Plaza 40 1
Washington D.C. 20590

September 21, 1998

To Whom It May Concern:

In regards to NPRM titled "Flight Plan Requirements for Helicopter Operations under Instrument Flight Rules." 63 Fed. Reg. 46834 (September 2, 1998). We at the American Express flight department would like to thank you for your effort in this matter. This rule would provide an increased level of safety in helicopter operations and would certainly reduce helicopter accidents.

The helicopter industry strongly supports this effort and understands its effect. This rule recognizes the unique characteristic of helicopter operations and would provide an additional margin of safety over flights conducted in marginal VFR conditions. This rule would encourage helicopters pilots to utilize the IFR system and would improve helicopter safety and would greatly increase the productivity of the helicopter.

In closing, American Express appreciates the steps that the FAA is taking in making this NPRM a final rule. It is comforting to know that the FAA understands these changes are necessary for helicopters to viably operate into the 21 Century at the highest level of safety possible. Thank you for your effort.

Sincerely,

Michael D. Toth

A handwritten signature in black ink that reads "Michael D. Toth".

Helicopter Captain

American Express Co.