

DEPT. OF TRANSPORTATION  
DOCKET SECTION

98 SEP 24 PM 4:47

Lucent Technologies  
Bell Labs Innovations



**4 3 3 6 4**

Lucent Technologies Inc.  
Lucent Aviation  
9 Airport Road, Hangar #2  
Morristown, NJ 07960

September 15, 1998

Telephone 201 606 4200  
Facsimile 201 606 3001

U.S. Department of Transportation Dockets  
Docket No. FAA-98-4390 - 9  
400 Seventh Street, SW, Rm. Plaza 401  
Washington, DC 20590

To Whom It May Concern:

The following comments are submitted in support of FAA NRPM titled "Flight Plan Requirements for Helicopter Operations Under Instrument Flight Rules." **63** Fed. Reg. 46834 Sep 2, 1998.

The proposed changes to FAR 9 1.167 and 9 1.169 are a tremendous step forward in recognizing the unique capabilities of the helicopter. These changes to IFR criteria, concerning fuel and alternate airport requirements, will enhance the corporate helicopter service provided to our executives. The corporate helicopter is a highly valuable tool providing safe, reliable, and expeditious transportation to airport and on site locations.

The IFR environment provides a higher level of safety in terms of aircraft separation, terrain avoidance and operations in marginal VFR. Enacting the proposed changes will allow the helicopter to take advantage of the IFR system on a more consistent basis. This department supports these changes and anticipates more progress in recognizing the special assets of "vertical" capable aircraft.

Sincerely yours,

Peter W. Oatis  
Director of Aviation