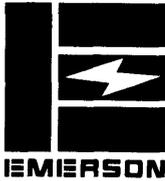


43883



DEPT. OF TRANSPORTATION
DOCKET SECTION

98 SEP 28 AM 10: 43

September 21, 1998

U.S. Department of Transportation Dockets
Docket NO. FAA-98-4390-14
400 Seventh Street SW
Room Plaza 401
Washington, D.C. 20590

Dear Sirs:

I would like to respond to the FAA's notice of proposed rule making (NPRM) titled "Flight plan requirements for helicopter operations under Instrument Flight Rules.", Docket number reference above.

This NPRM will greatly enhance our Corporate Helicopter Operations in several ways:

First and greatest is safety. It will reduce and possibly eliminate operations close to the ground in marginal helicopter VFR weather. Legal alternates and fuel requirements are almost always the primary hang-up for not filing IFR.

Second, it will provide incentive for operators to establish instrument approaches via GPS to landing sites that otherwise could only be used in VFR weather or accessed by Scud runnings.

Third, it will reduce the noise of low flying helicopters during low visibility high humidity times when sound travels farthest and is the loudest.

Fourth, although we train to IFR proficiency, many operators will have greater incentive to do so, greater incentive to provide instrument ratings to Pilots, greater incentive to keep ratings current and greater incentive to purchase IFR compatible helicopters and related equipment.

EMERSON ELECTRIC CO.
FLIGHT OPERATIONS
18444 EDISON AVE.
CHESTERFIELD, MO 63005

Operators will still need the flexibility to operate at lower special VFR visibility than airplanes as we do now since not all operators missions are compatible with an IFR system.

In summary:

I believe NPRM 4310 will enhance safety of operations, provide better trained crews who are able to use their IFR skills and equipment, and allow operators better utilization of aircraft.

Sincerely,

A handwritten signature in cursive script that reads "Steve Von Gruben".

**Steve Von Gruben
Senior Pilot**