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U.S. Department of Transportation Dockets,
No. FAA-98-4390,
400 Seventh St., SW,
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Washington, DC 20590

Response to Notice of Proposed Rulemaking (NPRM) titled "Flight Plan Requirements for Helicopter Operations under Instrument Flight Rules" 63 Fed Reg. 46834 (Sept. 2, 1998)

It is with great anticipation that we are awaiting the implementation of Docket No. FAA-98-4390 into FAR 91 .167 and 91.169. This rulemaking will enhance helicopter IFR Flight Operations in many areas. Please refer to the below listed comments:

Safety

Statistically helicopter IFR operations have proven to be one of the safest modes of operation. Positive control of aircraft operating under IFR allows constant monitoring. Aircraft in distress may be vectored to emergency landing sites, airports or improved weather conditions. Helicopter operations in marginal VFR conditions would be minimized possibly avoiding collision with terrain or obstacles. Additional benefit would be derived by the reporting of encountered weather along the route of flight especially existing lower level conditions.

A favorable ruling would implement the suggestions of the NTSB and the FAA to improve helicopter safety and provide access to the IFR system.

Productivity

Expensive equipment being purchased is not being effectively utilized under the current restrictions. By modifying FAR 91 .167 and 91 .169, helicopter operators will not be as reluctant to flying IFR and will complete those operations under the promulgated regulation. This enhanced criteria allows the helicopter and its unique characteristics to be prominently displayed maximizing utility and leading to increased economic viability.

NOISE ATTENUATION

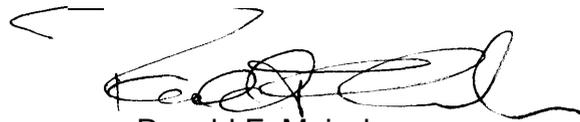
MINIMIZE disturbance to residents from special **VFR** operations being conducted at lower altitudes often over highly congested areas.

Recommendations

Listed below are additional implementations to improve helicopter IFR operations.

1. Examine the feasibility of incorporating copter ILS approach criteria where an ILS approach exists.
2. Based on installed equipment research the possibility of fifty (50) foot approach criteria for existing ILS approaches.
3. Review existing and supplemental low level IFR route structure.
4. Permit helicopter IFR operations to ILS runways not in active use for fixed wing aircraft thus avoiding the flow of traffic.

Thank you for your consideration in this most important issue. Safe flying.

A handwritten signature in black ink, appearing to read 'Ronald F. Maisch', with a long horizontal flourish extending to the right.

Ronald F. Maisch
Standardization Captain