



AHS INTERNATIONAL

The Vertical Flight Society

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DEPARTMENT OF TRANSPORTATION
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DOCKET SECTION

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September 25, 1998

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

Flight Plan Requirements for Helicopter Operations
Under Instrument Flight Rules, Docket No. FAA-98-4390 - 22

Dear Sirs:

AHS International concurs with the comments made by Helicopter Association International in a letter dated September 23, 1998 in support of the proposed rulemaking entitled "Flight Plan Requirements for Helicopter Operations Under Instrument Flight Rules," Notice No. 98-12, published in the Federal Register on September 2, 1998.

The NPRM will modify rules relating to IFR operations by rotorcraft, including weather minima necessary to designate an airport as an alternate on an IFR flight plan, alternate airport weather planning requirements, and fuel requirements for helicopter flight into IFR conditions.

The proposal is consistent with the letter and spirit of the AHS/HAI white paper, "Developing a Safe and Efficient Vertical Flight *Infrastructure*," in that it recognizes the three-dimensional flight and safety characteristics of rotorcraft, as distinct from fixed-wing aircraft.

Promulgation of the proposed rule changes will enhance rotorcraft flight safety. We urge the FAA to enact the changes as expeditiously as possible.

Very truly yours,

M. E. Rhett Flater
Executive Director