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Date: 4/22/99 12:39 PM
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To: 9-NPRM-CMTS
cc: aopahq@aopa.org; uspa@uspa.org
Priority: Normal
Subject: NPRM on skydiving operations

As a pilot and skydiver, please consider the following comments concerning skydiving operations:

First, the pilot in command of a jump ship should not be held accountable for the actions of the skydivers after they leave the airplane. The skydivers are pilots in command of their own vehicles (their bodies in freefall and their parachutes after deployment).

Second, reports of injuries and fatalities should be reported to USPA and the NTSB, not the FAA. The FAA can get statistics about injuries and fatalities from these organizations without putting jump ship pilots in jepordy of subjecting themselves to FAA enforcement actions.

Third, VFR aircraft transiting a drop zone must be made aware of skydiving operations.

I proposed the following to enhance the safety of skydiving operations for skydivers and the aviation community:

Sectional charts: The current symbol for a drop zone is far too small and inconspicuous. It is easily missed by a pilot planning a flight to or near an airport with a drop zone. It should be made much larger.

Special Use Airspace: The FAA should designate a cylinder of airspace with a 2 mile raduis from the center of the drop zone and from the surface to jump altitude that is active from 2 minutes before jump activity to 5 minutes after the last group of skydivers leave the airplane. The pilot of the jump ship will notify ATC of the jump altitude and give the 2 minute before call and the 5 minute after call. The pilot will also broadcast these calls as well as a jumpers away call on appropriate frequencies (UNICOM, CTAF). This airspace would be similar to MOA's where extreme diligence should be excersized by pilots transiting it.

Airmans Information Manual: A section should be included recommending VFR operations around a drop zone. VFR aircraft operating near a drop zone should monitor the appropriate frequency to determine if the drop zone is hot (the above special use airspace would be useful here). Transiting aircraft should remain clear of the drop zone. Arriving aircraft to uncontrolled airports that share a drop zone should follow established pattern entry procedures and watch

for canopies. Departing aircraft should also be mindful of canopies and fly straight ahead for 1 mile if feasible. Aircraft operating at controlled airports will follow ATC instructions.

Other areas of concern: Cloud clearance requirement. Skydivers make every effort to not jump through clouds. However, sometimes the spotter's judgement is off and once in freefall avoiding a cloud below is impossible. The adoption of the above special use airspace could be used to alleviate the cloud clearance requirement. Other weather minimums could be adopted for skydiving operations within this airspace that is more realistic such as sky conditions must be clear, scattered or broken, but not overcast.

Thank you for considering my comments



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