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Subject: Comments to Docket #FAA-1999-5483 - 7

I am very pleased to see this major undertaking of updating FAR 105 coming towards a logical conclusion. I have read the material in great detail and I have the following observations and comments to make.

In page 18303, reference is made to 14 CFR Sec.. 43.3(d), which states that a "supervisor personally observes the work being done to the extent necessary to ensure that it is being done properly and if the supervisor is readily available, in person, for consultation." Later, in page 18304, another reference is made..." In the proposed regulation, a certificate rigger must personally observe the entire packing process of the main parachute to ensure that it is being done properly by a non-certificate person who is not the holder of a parachute-rigging certificate." Finally, in the proposed 105.3 on page 18311, it again states "Supervision means that a certificated rigger personally observes a noncertificated person packing a main parachute to the extent necessary to ensure that it is being done properly."

I wish to make a suggestion that the section in page 18304 have its "personally observe the entire packing process" have included in it the phrase in the other two pages "to the extent necessary" added to it after the words "main parachute" so that a certificated rigger does not have to be staring at the entire process, only as much as is necessary, and that it conforms to the essence of the proposed 105.3. Such a re-write is probably not necessary because it is there as an explanation of the change being made. It looks fine in the definitions of 105.3.

In page 18304, discussion is made about notifying the ATC rather than the Flight Service Stations concerning Parachute Operations. This is stated in the proposed FAR 105.25 (page 18312). I understand the importance of this and the intent to get better communication between Flight Service facilities and ATC, but I wonder how the NOTAM system for year round operations will be maintained such that it is published in the airport facility directories if these operations. I also wonder how these year round operations will be continuously noted on the NOAA charts. Speaking of which, back in the early 1980's, there was a proposal for a much bigger magenta "Intense Parachuting Activity" block to be placed on charts where such activities were routine. This would be much better than the current small, barely perceptible parachute symbol is currently

used. (Ed Scott of the USPA has the reference documentation for this comment which was published back in the 1980's.)

In page 18308, reference is made to the reporting requirement expenses expected. Specifically, "Since this reporting requirement would be used to account for the total number of parachutists who sustain serious or fatal injuries, the FAA expects this proposed rule would affect approximately 44 drop zone owners, parachutists, or pilots....." The number 44 may apply to the number of fatal injuries, but it does not correspond to the number of "serious injuries" which include major broken ankle bones, leg bones, wrist bones, arm bones, and backs. I think that the estimate should be upgraded perhaps ten-fold to account for what the definition of "serious injuries" is (FAR 105.3, page 18310). USPA's headquarters would be able to give you a much more reliable estimate of the number of what your offices would classify as serious injuries ratioed to fatalities.

In page 18310, in proposed FAR 105.3, I feel the definition "Automatic Activation Device means a self-contained mechanical device attached to a parachute....." is way too restrictive for current technology. Most of the currently marketed devices in the skydiving/parachuting industry (Cypres and ASTRA) are microprocessor controlled, electro-mechanical devices which use a sensor to determine the altitude and rate of change of altitude and ignite a device which will push a knife-blade cutter through the closing loop of the reserve container, thus allowing the reserve container to open and thus allow the reserve parachute to deploy. The mechanical devices which were referred to in the existing statement (FXC Mark 12000, SSE Sentinel 2000, and other previous civilian and military surplus equipment) may have also had either mechanical or electrical sensors) which triggered a mechanical movement of the reserve parachute's ripcord from the closing loop of the system using either spring action or pressure tube action. I think it would be superior to revise the sentence to state, "means a self-contained mechanical or electro-mechanical device..." to cover all of the equipment in the sport industry. (The mentioning of a microprocessor controlled device would not be appropriate at this time and would be adequately covered and understood in the terms of electro-mechanical device.)

In page 18311, in proposed FAR 105.9, the first line has an unnecessary comma (grammatically incorrect usage). The line should read, "The Administrator may inspect any..." not "inspect , any..."

In page 18313, the proposed FAR 105.45 (a)(1)(ii), a listing of just 300 ram-air parachute jumps out of a total of 500 freefall parachute jumps is made. For the firm "The Uninsured Relative Workshop", the minimum

requirement
is 500 ram-air parachute jumps in 3 years. I suggest a re-wording of that paragraph to specifically ensure that "ram-air" parachutes were used on those 500 freefall jumps. Perhaps restating the paragraph as this: "Has completed a minimum of 500 freefall parachute jumps, which included the use of ram-air parachutes on at least 500 of those jumps,..." would be more in line with the current equipment manufacturers' requirements.

As I initially stated, I am very pleased with the efforts that went into the proposed revisions to FAR 105. I am well known for "nit-picking" in the sport regulations and documentation, and I hope that the items which I have pointed out in this e-mail note will serve both the industry and the government regulating authorities.

Sincerely yours,

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