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COMMUNICATIONS
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Comments on Proposed Rule changes to 14 CFR Part 105 Parachute Operations;

105.13 changes the requirement to ATC having jurisdiction from nearest ATC facility. This implies the need for maintaining communications with 2 or more facilities during the jump operation. Many drop zones have to deal with both an approach control for lower altitude jumps and center for high altitude (above 8,000 FT) jumps. I believe that many problems with traffic conflicts with jump operations are due to either no communications between ATC facilities or high workloads at these facilities to which I have been refused radar service many times. If communications are to be maintained at more than one ATC facility at the same time this would put at least a \$1200 to \$1500 unnessesary burden on most Cessna only drop zones on each plane to add a second radio which is currently not required. I feel the current requirement is more the sufficient and it should not be changed.

105.27 introduces a reporting requirement for injuries and fatalities that is currently not required. The Pilot-in-Command should not be included in this requirement. At most larger drop zones or at large jump meets (for example the **Freefall** Convention at **Quincy Il.**) have several jump aircraft in operation putting out jumpers at the same time. It is impossible for the pilot of a certain jump plane to know if that injured jumper jumped out of his/her aircraft. Only the manifest desk would have that information since the primary concern of the pilot is the correct number of jumpers on board, not who they are. I feel that requireing the Pilot-in-Command to report this information is unreasonable and impractical.

105.43 (3) adds the requirement that any automatic activation device be maintained in accordance with the manufacturers instructions. It is impossible for the Pilot-in-Command to be responsible for this because there are at least 4 different automatic activation device systems in use all with their own maintenance requirements. These maintenance requirements do not correspond with repacking the reserve parachute intervals. This requirement should be written so the person jumping the equipment is the only one (other than the parachute rigger) responsible for this requirement.

Thanks,



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