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Date: 6/10/99 6:24 PM
Sender: clarkson@bright.net
To: 9-NPRM-CMTS
Priority: Normal
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Subject: Comments on NPRM

Dear Sir or Madam:

This e-mail is in response to NPRM Docket No. FAA-1999-5483; Notice No. 99-03
for Parachute Operations.

1. I support the changes made to permit tandem parachute operations in a revised part 105 including the conditions and limitations for instructor experience, adequate passenger briefings prior to boarding the aircraft, equipment inspection and packing and incident reporting.

I specifically support the requirement that the PIC of a tandem parachute jump
be certified by the manufacturer of the specific tandem parachute system used
in that jump.

2. I whole-heartedly support the elimination of the requirement for a pilot chute assist device for static line deployment systems. My experience suggests
that removal of the pilot chute assist device will, in fact, improve safety for
static line jumps.

3. The proposed definitional changes in "supervision" by a certificated rigger
is appropriate and long overdue. The requirement for the certificated rigger to
personally observe the packing is necessary to provide oversight and ensure safety. Under the current definitions "supervision" has often been interpreted
to include being available by phone (or other electronic device?) for consultation when judged appropriate by the non-certificated inspector or packer.

This has resulted in many improperly inspected or packed reserve and/or main
parachutes that were subsequently used for both student and experienced jumpers. If the certificated rigger signs and seals the inspection and pack job
he/she should assume full responsibility for the airworthiness of the parachute
equipment. He/she cannot do this without personally and physically watching and
inspecting the work. Please make the proposed change to the definition of "supervision".

4. I do not support increasing the length of the reserve repack cycle time as
it currently exists. Extending the repack cycle at best will not improve safety
and, in fact, offers significant opportunity to reduce safety in parachute operations.

There has been considerable debate concerning the requirement for a 120 day

repack cycle for the reserve parachute. Many in the skydiving community are advocating extending the repack cycle to 180 days or longer. This discussion typically centers on whether the reserve will operate with the same deployment reliability and speed when packed for longer period of times.

This discussion is not relevant and the confusion lies in the language of SEC 105 itself. Sec 105.43 requires only a "repack" of the parachute. However, practice requires that the packing or supervising rigger only sign and seal a parachute he/she believes to be airworthy. This implies that the rigger must "inspect" the parachute prior to signing the packing data card and sealing the parachute assembly. That, in fact, is the current requirement.

Lengthening the repack cycle time will reduce the frequency of inspections for certificated parachutes and offers the opportunity for a significant reduction in safety.

Modern skydiving centers perform significantly more parachute operations today than they did in the past. Not long ago it was unusual for any parachutist to make more than a few dozen jumps per year. Large turbine aircraft utilized by "resort" type drop zones now perform up to tens of thousands of jumps per year including thousands of student jumps. It is common for a modern "recreational" jumper to make hundreds of jumps per year.

Many of these jumps are done using drop zone owned parachute assemblies particularly student and tandem equipment. The rest of the jumps are made by experienced jumpers using their own parachute equipment. The equipment used in these jump operations is subjected to significant abuse particularly the student gear. It is common (and, in fact, it nearly always happens) that this high use equipment requires some repair at every repack to make it airworthy. Seldom, if ever, is this high use equipment thoroughly inspected by an appropriately rated rigger between repacks.

If we lengthen the repack cycle these needed repairs may be unattended longer to the next repack time. This may reduce costs for drop zone and parachute school operators. It will also reduce safety particularly with parachute equipment used for student and tandem operations.

Please do not lengthen the inspection and repack cycle time. This would only compromise the safety of student, tandem and experienced jumpers.

This confusion maybe alleviated, in part, by adding the word "inspect" in each

passage of Part 105 or Part 65 that requires a repack for a reserve parachute assembly. In addition, the rigger whose signature and seal are affixed to the reserve parachute assembly should be required to document the inspection and maintain that documentation similar to the current log book requirements.

In summary, we are not discussing a simple repack cycle. We are discussing the lengths of time between airworthiness inspections of some critical equipment that can see severe service.

Do not lengthen the reserve parachute repack cycle. Instead, formalize the now unwritten requirement that the rigger include a documented airworthiness inspection with each repack.

Thank you for your consideration.

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