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U.S. Department of Transportation Docket No. FAA-99-5483  
400 Seventh Street SW  
Room Plaza 401  
Washington, DC 20590  
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Dear Sir or Madam:

This letter is a comment upon Docket No. FAA-99-5483, which concerns revision to the portions of the FARs which address parachute operations. I appreciate that the FAA is re-examining the rules in this important area.

However, I believe that one specific and significant flaw in these regulations will continue to be promulgated unless now changed in this process.

Sec. 105.43 requires that:

(b) The reserve parachute must have been packed by a certificated parachute rigger--

(1) Within 120 days before the date of its use, if its canopy, shroud, and harness are composed exclusively of nylon, rayon, or similar synthetic fiber or material that is substantially resistant to damage from mold, mildew, or other fungi, and other rotting agents propagated in a moist environment; or

(2) Within 60 days before the date of its use, if it is composed of any amount of silk, pongee, or other natural fiber, or material not specified in paragraph (b)(1) of this section.

The 120 day reserve repack requirement was established many years ago, before a full and complete database had been established regarding the long-term performance of modern synthetic polymeric materials. Manufacturers' experience with these materials has shown that longer repack cycles would not cause adverse impact.

The original 30 day repack cycle and the successor 60 day cycle were promulgated at a time when natural fibrous materials were used in many types of parachutes. The 90 and later 120 day cycles were substituted as the knowledge base grew concerning the replacement synthetic fiber materials. The shorter repack cycles also grew out of military procedures associated with varied storage or deployment environments where equipment would be exposed routinely to harsh acidic or alkali chemicals, petroleum products, or other harmful substances. Such exposure environments are rare today in the civilian arena.

The 120 day repack cycle is a requirement that has outlived its usefulness. Most certificated parachute riggers agree that either a six month or one year repack cycle would be quite sufficient for the purposes of inspection and repack of the reserve parachute.

Given the large amount of handling associated with modern high density reserve parachute packs, longer repack cycles would induce less wear and tear upon what is essentially an emergency system, and which should be protected from such routine wear and tear.

The 120 day repack cycle burdens those engaged in Parachute Operations with large labor expenditures, due to the costs of repacking reserve parachutes. This added expenditure is unproductive and acts as a brake on aviation activities. I estimate the economic saving associated with moving to a six month or 180 day repack cycle at over \$600,000. I estimate the economic saving associated with moving to a one year repack cycle at over \$2 million..

Let me note here a suggestion for minor improvement: that a cycle time based on months rather than days would facilitate tracking repack due dates---the resulting difference in days between repacks would be negligible. The present 120 day requirement requires counting calendar days, something that would not be required if the requirement called out "months" rather than "days".

Please Also Note: because of the special nature of Tandem Parachute Equipment, and the substantially greater wear, tear and stresses placed upon tandem equipment, and the presence of "passenger parachutists", and finally because of the lesser experience base in connection with Tandem Parachute Equipment, I am of the opinion that the reserve repack cycle for Tandem Parachute Equipment should remain at the 120 day cycle for the foreseeable future.

Thank you for taking note of my concerns with regard to the proposed changes. I believe that my views above are shared by the vast majority of those members of the public engaged in Parachute Operations.

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