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## Comments on proposed rule changes to 14 CFR Part 105

I am very pleased to see the proposed changes to FAR105. I have been a sport parachutist for 10 years and 5,000 jumps. I hold USPA Instructor/Examiner in Static line, Accelerated Freefall, and Tandem. I also am a Tandem examiner for Relative Workshop, JumpShack, and Stunts, as well as a FAA Senior Parachute Rigger QL2. I submit the following comments on the proposed changes.

All FAR sections listed correspond to the proposed new rule.

*105.3 Definitions: AutomaticActivationDevice- means a self-contained mechanical device attached to a parachute...* This definition is very restrictive and does not include the devices currently being used. The Cypres and Astra are microprocessor controlled electro-mechanical devices. The definition should read; *means a self-contained mechanical or electro-mechanical device...*

*105.3 Definitions: Serious injury- ... or nerve, muscle or tendon damage;* this definition would require countless number of reports for sprained ankles, pulled muscles, pinched nerves... this part of the definition should read; *or nerve, muscle or tendon damage that requires a visit to a physician;*

*105.17 ...and no pilot in command of an aircraft may allow a parachute operation to be conducted from that aircraft-(a) Into or through a cloud, or (b) when the flight visibility or the distance from any cloud is less than that prescribed in the following table:...* With today's gliding square parachutes, this requirement puts an undo burden on the pilot. In the days of round parachutes, the distance a parachute could glide allowed the pilot to be able to insure the proper cloud clearances. Today the glide slope for square parachutes can exceed 3:1. The jumper can exit the a/c clear of clouds then fly his open parachute in a manner not adhering to the cloud clearances. The pilot of the aircraft should not be held responsible for others actions.

*105.21... Parachute operations over or into a congested area or an open assembly of persons ..* the current rule states that the application for Certificate of Authorization be submitted 4 days in advance. The proposed rule removes this requirement. Without a set time to apply, the applicant will have to follow the requirements on the form 7711-2. This form states that the application must be submitted 45 days in advance. The 4-day time limit should remain.

*105.27... The FAA must be notified.....by (a)Each parachutist involved in the accident, or (b)the pilot of the aircraft, or (c)the drop zone owner or operator* This rule again poses undue responsibility on the pilot of the aircraft. At busy drop zones, the pilot may not even get out of the a/c all day, except for fueling, so he may not even know if there was an incident. In addition, the owner of the drop zone may not be involved in the daily operation of the facility. The rule should read *... must be notified...by (a) Each parachutist involved in the accident, or (b) the drop zone*

*operator*

*105.43...paragraph (a) the main parachute must have been packed within 120 days...and paragraph (b)(1) the reserve parachute must have been packed by a certificated rigger – (1) Within 120 days before the date of its use* The rule for the 120-day cycle is 20+ years old. It does not take into account the advances made in parachute fabrics, and packing methods. Excessive handling and exposure to UV rays is detrimental to nylon fabrics. Decreasing the amount of exposure to these harmful effects is needed. The cycle should be increased to 180 days. This longer cycle has been in place in many other countries in the world, including Australia, NewZeland, Germany, France, Sweden, and UK. The parachuting organizations in these countries have reported no decrease in safety from the 180-day cycle. The rule should read...*105.43...paragraph (a) the main parachute must have been packed within 180 days...and paragraph (b)(1) the reserve parachute must have been packed by a certificated rigger – (1) Within 180 days before the date of its use*

*105. 45...Use of Tandem parachute systems...* This section as written is a direct infringement on USPA and the tandem equipment manufactures training methods. The FAA is lacking the knowledge to dictate the experience and training of parachutists. This is better left to the USPA and the tandem equipment manufactures. This section should be deleted. The use of tandem parachute systems should be addressed in section 105.43. Changing the wording of the first paragraph in this section is the maximum necessary to allow tandem skydiving. *“No person may make a parachute jump, and no pilot may allow any person to make a parachute jump from that aircraft, unless that person is wearing an approved harness attached to a parachute pack having at least one main parachute and one approved reserve parachute that are packed as follows...*

Also add a paragraph in this section stating *“Tandem parachute jumps must be conducted in accordance with a program approved by the administrator.”* The definition of a *“tandem parachute jump”* – means a parachute jump with more than one person using the same parachute assembly.

Thank you for allowing me to comment on this proposed rule change,

Jason Askerooth  
Concerned Skydiver