

SKYDIVING OPERATORS ASSOCIATION, INC.

ORIGINAL

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U.S. Dept. of Transportation
(DOT) Dockets
Docket No. FAA-99-5483 - 30
400 Seventh Street SW.
Room Plaza 401
Washington, DC 20590

99 JUL 12 AM 11:24
FEDERAL AVIATION
ADMINISTRATION
DOCKET SECTION

Dear Sirs/Madam,

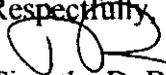
We are sending this letter to comment on the NPRM for FAR 105. The opportunity for positive change to be implemented in the **FARs** for skydiving has finally arrived. Considering the **difficulty** of revising any FAR, a simple misused word or phrase can mean complications for years to come. It is important that the FAA follow the guidance of the industry's self-governing body, the United States Parachute Association, when considering this revision.

USPA has recently submitted to the FAA, a comprehensive analysis and commentary to the current NPRM. The fifty-plus skydiving centers that are affiliated with the **SOA**, unanimously recommend that the language and suggestions from **USPA**, be incorporated into the NPRM as closely as possible, prior to finalizing the new FAR 105.

Only by following the advice of true industry experts, can the FAA **expect** to accomplish a reasonable and meaningful revision to FAR 105. Adopting the NPRM without the benefit of **USPA's** suggested revisions, will be a detriment to safety and could in some cases, endanger the public. As a side benefit, these suggested revisions will address many 'gray' areas that exist in the present and in the proposed FAR.

We strongly urge you to review this NPRM and revise it with **USPA's** suggestions prior to implementation as FAR 105..

Respectfully,


Timothy D. Butcher, President

The Skydiving Operators Association, Inc. is a non-profit organization that represents over 50 Professional Skydiving Centers in the United States. Our goal is to express the interests of the Skydiving Operator by utilizing our influence with and through the skydiving industry's nationally recognized organizations, the **USPA** and the **PIA**.