

59164

Coolidge Municipal Airport

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**COMMENTS ON PROPOSED RULE MAKING (PART 105)**

**Rule for Part 1 OS. 19, 105.23(a) and 105.25(b)**

**Is good, but, it should also provide jump itinerary as to altitudes, type of jump and dates.**

**Reason:**

**-This will help relieve the work load of ATC; as with the Department of Defense who provides all times, type of jump, hours, etc., and is provided several weeks before activity begins. This enhances safety as it give ATC knowledge of skydivers that jump at high altitudes and free fall long distances before opening (HALO).**

**-Also, ATC should have on file suggested safety procedures with the airport management. ATC should have a written copy of the agreement between airport management and civilian jump operators as to the type of jumps allowed, whether onto or drift over the airport.**

**-There should also be a distance outside of the airport boundary that a drop zone is allowed. If it is too close to the airport boundary, then drifting over the airport could create a hazard to arriving and departing traffic.**

**-In my course of witnessing skydivers, I have discovered they do not follow rules very well, and many time they ignore airport management's request, especially when management is not on the airport.**

**Rule for Part 105.17 (current)**

**-The control tower requirement is good.**

**-However, the part that allows a parachutist to drift 2000' above the airport traffic pattern needs to be changed.**

**Reason:**

**Traffic patterns are normally 1000' AGL. Jet aircraft fly at 1,500' AGL which is a normal traffic pattern. Therefore, to enhance safety, this should be changed to 2,500' above the airport traffic pattern. This gives a full 2,000' to high performance aircraft and an additional 500' safety barrier for all other type aircraft.**

**105.19 (current) 105.25**

**-This definitely needs to be addressed.**

**Reason:**

**This should be changed to read "ALL POSITIVE CONTROLLED AIRSPACE" such as A, B, C, D etc. Wording of this nature will copy in all future positive controlled airspace, for example If SID and STAR routes or other designated airspace are deemed positive. Bear in mind, that regulations are written for safety for all.**

**105.27 - Good**

**105.41 - Good**

**105.43 - Good**

**105.15**

**-This needs to be addressed.**

**-An initial standard transponder code should be used regardless of the jump altitude. If the ATC controller, due to work load, is busy and cannot immediately respond to an initial call up by the jump aircraft he can monitor that aircraft's movement and altitude.**

*Capt. A.J. Brunetto (TWA)*

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DEPT. OF TRANSPORTATION  
DOCKET SECTION