

59293

ORIGINAL

John H. Ring
9752 Kingtown Road
Trumansburg, N.Y. 14886

DEPT. OF TRANSPORTATION
DOCKET SECTION

99 JUL 13 AM 11:36

U.S. Dept. of Transportation Dockets
Docket No. FAA-99-5483 -36
400 Seventh street SW.
Room Plaza 401
Washington, DC 20590

July 8, 1999

Dear Sirs,

I have been an active skydiver since 1973, a pilot since 1975, and a parachute rigger since 1983. I am glad to see that this part 105 "parachute jumping" is being updated. I would like to comment on the proposed changes.

New section, 105.27, Accident reporting. I feel that the estimate of 44 reportable accidents using the NTSB terms is in error. A broken ankle, which is not all that serious, would be included in the NTSB terms. Some landing injuries by experienced skydivers are basically self inflicted due to carelessness and have nothing to do with safety. Misuse or misinterpretation of this data may result in unnecessary regulations. The U.S. Parachute Association has a voluntary reporting program that works well and is more likely to be unbiased I object to this section.

New sections 105.5 and 105.17 hold the pilot responsible for the actions of the jumpers. With today's skydiving techniques and **equipment**, a jump pilot can drop skydivers in full compliance with these two parts and the skydiver is capable of violating them. A skydiver in free fall is capable of diving at a 1 to 1 glide ratio, and modern parachutes have a glide ratio of 3 to 1. At the normal **aircraft** exit altitude of 13,000 feet, a skydiver can cover several miles before landing. The pilot of a plane towing a glider is not held responsible for the actions of the glider pilot once the glider is released and the jump pilot should not be held responsible either.

New section 105.23 implies that the airport manager has blanket approval over skydiving at that airport. This is true for private airports or those that do not receive **federal** tiding. Airports that do receive federal funding have an obligation to accommodate skydiving operations. This section needs clarification.

New section 105.43 as it relates to parachute packers, A parachute rigger should only need to be available for consultation, not standing over the packer every minute as implied. Automatic activation devices on reserves should be treated equally with other aircraft accessories and not make manufacturer's service and maintenance bulletins mandatory. Repack / inspection cycles for main and reserve parachutes should be extended to 6 months. Many other countries now have this six-month cycle and this would bring the U.S. into a worldwide standard. As a parachute rigger since 1983, I have seen no evidence to indicate that this extended cycle would compromise safety, to the contrary, I have seen the wear and tear that repeated packing has on the modern reserves. I would like to recommend a six calendar month repack / inspection cycle rather than a 180day cycle that may be proposed by others. Since not all months have 30 days, a six-month repack cycle would be easier to calculate. With a six-month cycle, a parachute packed on January 1 would be due on July 1. Using a 180day cycle it would be more difficult to calculate and would change during Leap Year. I believe the intent is for an **inspection** twice each year, 180 days would be 5 or 6 days short.

New part 105.45 I fully endorse the use of tandem parachute systems as a means of skydiving. The millions of tandem jumps made have shown it to be a safe reliable means of skydiving and student **training**.

I have reviewed the comments made by the United States Parachute Association and in addition to my own comments I endorse their comments as well.

Sincerely,


John H. King