

Date: 7/12/99 8:31 AM
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To: 9-NPRM-CMTS
Priority: Normal
Subject: 180 day (or 6 month) repacks

FAA-99-5483-40

RE FAR 105

As a sport parachutist I believe the reserve repack cycle defined in FAR 105.43 should be lengthened to 6 months for these reasons:

1. Modern day fabrics and construction techniques makes it unnecessary to inspect reserves as often.
2. Tests by parachute industry experts have found that handling and repacking of reserve parachutes actually weakens and degrades their performance, thus a longer repack cycle enhances the safety of the reserve.
3. Several countries have instituted the 180 day or 6 month reserve cycle and found no decrease on safety.
4. Modern sport parachute rigs are very expensive and a life saving device, which makes sport parachutists take proper care of their equipment (reserves), by doing regular external inspections of the reserve container, and storing the rig in proper conditions.
5. A 6 month cycle instead of 180 days simplifies paperwork (eliminates counting days and possible mistakes by riggers or FAA inspectors), adds very few days, and is typical of how the FAA designates time periods in other areas of aviation. Examples are pilot biennial reviews, pilot medicals, aircraft annual inspections.

Thank you for considering my comments.
Kay Green

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" ... and once you have tasted flight, you will walk the earth with your eyes turned skyward, for there you have been and there you will long to return..."

-- Leonardo da Vinci



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