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After reading this NPRM, once again the FAA needs to better define the requirements. The definition of Scheduled Operations as written in FAR part 119 and the intent of this NPRM really do not work together. In Alaska many operators will choose the easy way by using our confused definitions against us.

There must be guidance with no room for error or interpretation on this subject. Aging aircraft are a large concern, lets do it right the first time.

As for the AC that goes along with this NPRM, there are unclear definitions as well and the FAR's stated either don't exist or are not correct.

Please feel free to contact me if you have any questions or comments

Sincerely

Andy Rembert
AA1-235A



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