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To: U.S. Department of Transportation Docket
Docket No. FAA-99-5927-m
400 Seventh Street S.W.
Washington, D.C. 20590

Subject : Federal Aviation Administration Notice
Of Proposed Rulemaking (NPRM)

Commercial Air Tour Limitation in the Grand
Canyon National Park Special Flight Rule Area

From: James E. Cruson
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Date: September 3, 1999

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PROJECTS
28 SEP -3 PM 1999

My comments will be limited to paragraph F. **“FLIGHT PLANS”** portion of the NPRM.

Commentors from this company (Air Vegas, Inc.) have provided written comments on other aspects of the NPRM, with which I concur. Further comments would be repetitious and unnecessary. I consider the proposed method of ensuring compliance with the commercial air tour limitation a flight safety hazard. Filing VFR flight plans with an FAA flight service station is an additional burden on the flight dispatch section, however, it is not insurmountable. The opening and closing of VFR flight plans by the pilots, particularly the opening, I feel is unacceptable for the following reasons:

A typical launch from this operator's home base (Henderson Executive Airport) frequently consists of 12 aircraft launching consecutively, with VFR lateral separation. Other tour operators flying out of North Las Vegas and McCarran Airports have similar launches, some with more than 12 aircraft. Each operator has canned departure and arrival agreements with Las Vegas RAPCON and the Grand Canyon National Park Airport tower flight following is provided by Las Vegas RAPCON until exiting class B airspace when departing Las Vegas area airports.

All operators from Las Vegas follow the same route from Hoover Dam to the Grand Canyon National Park SFRA. Once inside the Grand Canyon National Park SFRA, the same applies, all aircraft are on the same route. This makes the airspace to and in the Grand Canyon National Park SFRA at times, probably the busiest airspace in the Continental U.S. if not the World, i.e. the heaviest concentration of VFR traffic. The

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enviable safety record established in this air space since SFAR 50 was established in 1988 is due to heads up flying in a VFR environment. In the vicinity of Las Vegas, flight following from LAS RAPCON and in all other areas, precise position reporting over prominent geographic landmarks have provided the necessary measure of safety.

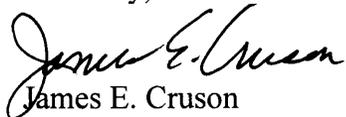
If pilots are required to open VFR flight plans, an additional workload will detract from the necessary concentration in monitoring approach control and/or enroute frequencies while maintaining a constant visual vigil.

This company attempted to fulfill regulatory flight following requirements with VFR flight plans some time ago. This system was discarded because of the difficulty and confusion that occurred when numerous aircraft attempted to contact the flight service station to open VFR flight plans. This confusion occurred with as few as five aircraft launched in sequence. Imagine what it would be like with several operators launching at similar times.

The same problem will occur when arriving at the Grand Canyon and back at Las Vegas on the return trip. Attempting to contact the flight service station to close flight plans when pilots should be concentrating on monitoring the enroute, tower or approach control frequencies while maintaining visual separation from other aircraft can do nothing but detract from flying safety.

For the above reasons, I suggest this method of ensuring compliance be discarded prior to the final rule.

Sincerely,



James E. Cruson
Vice President/Operations

JEC/mv