

Clarify part 91 in reference to Special VFR so that pilots know that they can request it if they cannot maintain VFR even if the tower is reporting VFR. The Controller's Handbook addresses it, but the AIM does not. Since pilot's don't know about it, controller's don't practice it, and deny those requests. As a result, there is a zone of reported cielings (1000'-1500') where a pilot can neither fly VFR or Special VFR while maintaining obstacle clearance over populated areas (1000').