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U.S. Department of Transportation Dockets,  
Docket No. (FAA-2000-7623) - *26*  
400 Seventh Street SW.  
Room Plaza 401  
Washington, DC 20590

I would like to suggest a review of the following Title 49, 14 CFR, FAR Part 135:

FAR Part 135.223. Recommend that this regulation be changed to mirror the recent change to 14 CFR, FAR Part 91.169 (b) (2) (ii) and (c) (1) (ii) regarding helicopter IFR alternate planning. Part 91.169 was changed taking into account the unique capabilities of helicopters. Numerous Helicopter Emergency Helicopter Services operators conduct IFR operations. Currently Part 135.223 severely restricts these operations by not considering the unique capabilities of the helicopter.

FAR Part 135.225: The very nature of FAR Part 135, On Demand Operators, requires them to operate in and out of remote airports served by instrument approach procedures but not a weather reporting source approved by the NWS and Administrator.

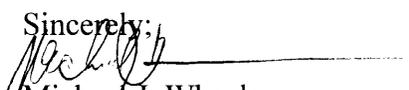
Because of this regulation, many 135 operators will depart into marginal weather conditions under VFR and pickup an IFR clearance once in flight. They also will execute an instrument approach to one airport and then fly under VFR, in marginal weather, to the intended destination.

The operation described above is legal but does it provide the flying public a higher level of safety? I think not. Would it not be safer to allow an operator to execute an instrument approach to the real destination and or depart IFR from an airport without weather reporting? If necessary require an alternate to be filed in these situations. But let's clean up this dangerous but legal loophole.

FAR Part 135.181: The current wording of this regulation prohibits single engine aircraft from operating IFR or over the top while carrying passengers. However, the FAA allows these type operations by Operations Specification number 46. When reviewing the preamble of Part 135.181 it is clear the intent of the framers of this regulation was to allow single engine IFR, they knew it was safer than "scud running".

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Sincerely,

  
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