

As one of many aerial advertising (banner tow) operators whose existence depends on having access to the airspace above and surrounding major outdoor sporting events (NASCAR, NFL, MLB, NCAA),

I am very concerned about certain aspects of the proposed ruling.

I agree in general that safety is paramount and have no exceptions to flight restrictions over airshows as proposed. However, having been in the aerial advertising business for several years, I am also aware of the fact that certain organizations would like to have operational control over the airspace surrounding their events. This is less of a matter of safety than of economics for them. Under too broad a ruling, the door will be opened for capricious requests to close off the airspace to businesses as ours, unless, which has been the case in the past, we are asked to pay royalties in order to prevent such flight restrictions.

No commercial organization, school or business owner should be allowed to arbitrarily determine which flight operations are part of the event - and this is exactly what can happen.

As far as the economic impact being negligible, I do have my doubts. A lot of peoples livelihoods depend on aerial advertising and I would not be surprised if aerial advertising spending over such events exceeds \$100 million p.a.

Consideration for civil liberties of banner tow operators is requested.

Should the ruling move forward as proposed, the economic impact on many entities could be devastating and drive many businesses out of existence.