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Tuesday, December 12, 2000

Docket Management System  
US Department of Transportation  
Room Plaza 401  
400 Seventh St., SW  
Washington, DC 20590-0001

00:00:10 PM 2/17  
FBI OF TRANSPORTATION

RE: Docket No. FAA-2000-8274; Notice No 00-13 -15

To Whom It May Concern:

This letter is in response to the proposed rulemaking governing Temporary Flight Restrictions (TFR). If enacted, this regulatory change will impact general aviation as a whole, but mostly will affect those in aerial advertising and aerial photography. As a business owner and a member of the US Banner Tow Association I would like to express my concerns about this proposed rulemaking and how it will affect our existence.

Beach Banners, Inc is a Florida based company in the business of Aerial Advertising for major events. An example of such events are NASCAR Races, NFL football, NCAA football, major concerts and other gatherings. These events produce the majority of my business and will be gone with the proposed rulemaking.

All banner tow operators across the country have a waiver issued by the FAA stating safe operation altitudes to operate over congested areas. These altitudes are well with in the "safety" range of operation of banner tow aircraft. These waivers also provide a limit to the number of aircraft that can operate over stadiums at any one time and states the weather minimums for operation while towing banners.

This ruling is too broad and only lists a few of the outdoor events that will have the temporary flight restrictions. However, if you look closely it states "any other aerial demonstrations or sporting events the FAA determines to need a temporary flight restriction." To me that says every outdoor stadium or gathering will eventually have a temporary flight restriction.

As an American in a free enterprise system we make a living at what we do best. I make a living at towing aerial signs over major events. This proposed rulemaking may in turn have a very substantial part in my living and the livelihood of all banner towers across the country.

Regards,

  
Joel Weaner  
Beach Banners, Inc  
US Banner Tow Association

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