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December 12, 2000

Sent Via USPS Certified Mail

Docket Management System  
U.S. Department of Transportation  
Room Plaza 401 / 400 Seventh Street  
S.W. Washington, D.C. 20590-0001

RE: *Docket # FAA - 2000-8274 -18*  
*Notice No. 00-13*

00 DEC 19 PM 12:06  
DEPT OF TRANSPORTATION

To whom it may concern:

As the world's oldest and largest banner tow operator, the above NPRM is of great concern to us. The notice of proposed rulemaking relative to restricting flights over major sporting events will not only have a detrimental impact on the livelihood of our organization but it could also single handedly cause the death of the entire banner tow industry.

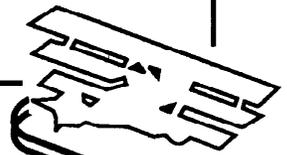
To the best of my knowledge, the operation of banner tow aircraft around major sporting events has *never* directly or indirectly resulted in the injury and/or damage to third persons. In the fifty-four year history of our company, we have certainly never experienced this situation.

My objective is not to address this matter as an issue of public safety but rather to point out the economic impact of your proposed rulemaking on the banner tow industry as well as the customers who are served.

There are well over four hundred certificated banner tow operators registered throughout the continental United States. Although many operators are limited to a one or two aircraft operation, there are over forty companies who generate a substantial sum of revenue from the sale of aerial advertising. Within our organization alone, we employ over sixty people in various capacities at an annual cost of over \$1.3 million dollars.

Based on our analysis, the industry in its entirety accounts for over \$40 million dollars annually. Based upon the average rate charged for aerial advertising services (\$350 hourly), we estimate that over 112,000 hours are flown annually.

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When an advertiser makes a decision to spend his or her ad dollars on a particular medium whether it be television, radio, print or any form of advertising, a certain rate of return is expected from their advertising expenditure. While the expected returns vary depending upon the product or service being advertised, as a general rule, for every aerial advertising dollar spent, advertisers expect ten dollars in return. Assuming aerial advertising is a \$40 million dollar a year industry, the estimated economic impact on the sales of our advertisers would amount to approximately \$400 million dollars.

Another significant factor which cannot be overlooked is the economic impact we have upon our vendors and suppliers. Between local and national vendors, we expend over \$2.4 million dollars annually. Our purchases cover a wide variety of areas such as aircraft fuel, engine overhauls, aircraft parts, banner materials, etc.

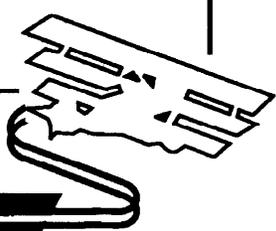
In conclusion, we feel that unless major changes are made to this proposed rulemaking regarding the temporary flight restrictions, the impact upon both our employees and our customers will be financially disastrous. If our company is representative of the industry, which we believe it to be, then hundreds of good paying aviation related jobs will be lost. Additionally, the total economic impact upon our customers could result in lost revenues of hundreds of millions of dollars.

It escapes me as to how the FAA arrived to the determination that this proposed rulemaking will not have a material economic impact upon a substantial number of smaller entities. I would very much like to review the supporting information as to how the FAA reached this conclusion.

Sincerely,



Brian W. Broderson  
Chief Financial Officer



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