As a growing full time banner operation in the Great Lakes Region we are very concerned about the proposed rule changes. I therefore offer the following comments:

First, the portion of the new rule regarding airshow type events is valid. As it is now, even with a smaller airshow type event than the Thunderbirds etc, a NOTAM is usually issued for the period the airport and surrounding airspace will be occupied for these type flights. Perhaps you could include the NOTAM over the recorded ATIS information at nearby controlled airports and also ask flight watch to disseminate the info to pilots flying in the vicinity.

Second, 91.137 of the FAR's. I believe disaster/hazard does need to be better defined. These should include only these things however that will bring a large of volume of relief aircraft or aircraft that are heavy and need to maneuver to do there work without the distraction of "see and be seen" collision avoidance of sight seeing flights. A hazard should not include air traffic at a sporting event at any rate.

Third, congestion over sporting events. It is true that there are too many sight seeing flights over the many events listed in the proposal. I applaud the National Baseball league and others listed for their concern over flight safety and the crowd safety. However as a commercial operator with a Flight Standards Waiver already issued, I fail to see the relevance of prohibiting banner towing operations at any of these events for the following reasons. 1) Banners tow operators cannot ever fly over a crowd of people. 2) Banner tow operators are "participating" in the event, not sight seeing or spectators. 3) Banner tow operators have an outstanding safety record even with the amount of air traffic at some of these events. Local FAA offices around the country, issue banner operators at busy locations, restrictions ie. Number of banner flights in the air at a time over the event, altitudes to fly, and time of each flight.

Fourth, economic impact. To require banner operators to obtain a waiver for each event would in effect put us out of business. Our major business is done on a short phone call a few days before an event. There wouldn't be enough time to complete the paperwork required to comply with the new rules.

Conclusion: I would ask that the proposed rule 91.145 (d) (3) be added to reflect that banner tow operators with a valid Waiver to tow banners be included.

As a personal comment, banner tow operators generally tow signs for anyone that contracts them. These may not be paying sponsers of an event that the sign is flown over. It is understandable that the event promotors are upset at not getting a profit from these signs, but for the promotors to be able to in effect control the airspace over an event is more upsetting.

Thank you!

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