

AVIAD

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DEPT OF TRANSPORTATION

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North Andover
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Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street SW
Washington D.C. 20590-0001

December 20, 2000

RE: Docket Number FAA-2000-8274 - 32
Notice No. 00-13

To whom it may concern:

Docket number FAA 2000-8274 is a thinly disguised attempt at the biggest "land grab" in the history of US Aviation. The FAA is mandated to "foster and further air commerce", yet this proposed rule would strip a major segment of general aviation businesses of their rights to operate in a free market economy. The NPRM is forwarded under the guise of "air safety". Yet there has never been any incident in the 80 year long history of aerial advertising in which a member of the public has had their safety compromised. In fact, the enclosed letters from FAA personnel illustrate the opposite. There is no basis for this proposal other than the greed of event promoters, who "want it all!" Withdraw this NPRM now.

A classic case of this unscrupulous greed was the attempt by FIFA at restricting flights over World Cup Soccer. Although FIFA was able to talk their way into restricting flights over Chicago, they were unsuccessful at doing so in New York, Boston and Los Angeles. Was Chicago somehow more dangerous than the other cities? No! Simply put, FIFA managed to put enough political pressure on one local FAA office to effect a ban on flights in that city. Were there any incidents, or was safety in any way compromised? No! Commercial operators have sufficient sense, training and regulation to safely operate in the vicinity of large gatherings. There is absolutely no evidence to the contrary; and given the FAA's written declaration to the opposite (see enclosed letter) then what's wrong with this picture? It's about the money! This NPRM has NO PLACE in the regulations. Retract this proposal now!

Additionally, there are a number of serious flaws and misinformation in the NPRM as it stands: For example, this NPRM is poorly researched. Clearly there is potential for massive economic impact as opposed to the assertion on page 12 that there is no significant economic impact. As one of the older and larger aerial advertising companies in this country and the world, I ask the author of the NPRM, "when were we queried as to our revenues, numbers of employees or the potential impact?" The assertion of "no significant impact" is ludicrous. The total economic impact on Aviad's operations on an annual basis exceeds \$25 million dollars, both in the loss of revenues, and in the loss to employees, suppliers and contractors. Add to this the effect from the loss of advertising space and promotional value to clients, and you have a very substantial economic impact.

The AVIAD logo consists of the word "AVIAD" in a bold, white, sans-serif font, centered within a solid black rectangular background.

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I do not understand how the author of this NPRM could come to an informed conclusion without having first completed basic research; and as none of the operators affected have been queried, no research appears to have been done. In accordance with The FOA, I therefore respectfully request copies of all documentation used in coming to your economic impact conclusion. Please forward them to this address. Please also forward all copies of documentation and correspondence from the parties requesting this NPRM.

Restricted access to public airspace sets a dangerous precedent, and can never be tolerated in the USA. Withdraw this NPRM or delay it until you have completed basic research, and solicited input from all affected parties. We have a working system, which will always require enforcement and diligence. Speaking for my many associates across the nation, the 600 licensed aerial advertising companies will simply not accept this NPRM as it is worded; and will seek all means including injunctive relief to protect our constitutional rights in a free market society.

I am a commercially licensed pilot with 14,700 hours of flying time. My family is now celebrating its fourth generation of pilots with a history dating back to 1929. I am the recipient of the FAA's "Good Friend of the Year Award" based on my work in aerial advertising safety.

I remind you once again of your dictate to "foster and further air commerce," not to unjustly, unfairly or illegally hamper it.

Cordially,

A handwritten signature in black ink, appearing to read "Wayne Mansfield", written in a cursive style.

WAYNE MANSFIELD
President



US Department
of Transportation
**Federal Aviation
Administration**

FLIGHT STANDARDS DISTRICT OFFICE #61
NORWOOD MUNICIPAL AIRPORT
NORWOOD, MA 02062

May 9, 1983

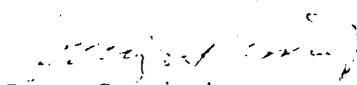
National Aerial Advertising, Inc.
Box 303
North Andover, MA 01845

Gentlemen:

It is with pleasure that we acknowledge the level of professionalism and cooperation with which your organization conducted itself in participating above the Boston Marathon on April 18, 1983. The level of safety for the participants and observers was a result of the consistent spirit of responsibility exhibited by each operator. We appreciate and applaud your contribution to the success of this event.

In the process of writing the "after action" report, we are looking for any ideas or suggestions which, if implemented, will help promote safety in the coverage of next year's Marathon. If you have any input, we would appreciate your sending it to us or you can call Inspector Lorraine Harrison at (617) 769-7120.

Sincerely,


Barry Bermingham
Acting Manager, NE-FSDO-61



U.S. Department
of Transportation

**Federal Aviation
Administration**

800 Independence Ave. S.W.
Washington, D.C. 20591

April 17, 1995

Mr. Wayne Mansfield
Aviad Corporation
P.O. Box 303
250 Clark Street
No. Andover, MA 01845

Dear Mr. Mansfield:

Congratulations! You were nominated and selected as the recipient of the New England Region Flight Standards 1994 Good Friend Award.

This award honors an individual or group who has in some significant way either promoted, enhanced, or supported the Flight Standards mission. The nomination describes your outstanding leadership abilities and active involvement with the banner towing industry. You were responsible for initiating and bringing together the banner tow pilots and operators in the Boston metropolitan area in an effort to discuss and establish standard guidelines to be used throughout the banner towing industry. By opening the lines of communication between the FAA, the National Transportation Safety Board, and the banner tow industry, you have significantly enhanced and supported the Flight Standards mission. You also are recognized as an active aviation safety counselor for the Boston aviation community.

On behalf of the entire agency, I thank you for your support of Flight Standards programs.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Accardi", written over a horizontal line.

Thomas C. Accardi
Director, Flight Standards Service



February 22, 1996

Wayne Mansfield
AVIAD
250 Clark St.
N. Andover, MA 07845

Dear Wayne:

SUBJECT: NFL EXPERIENCE THANKS

On behalf of NFL Properties, thank you for AVIAD's support of the NFL Experience.

The NFL Experience has taken on a life of its own as we together have expanded the breadth of Super Bowl's largest continuous event.

The NFL Experience was an unqualified success. It attracted over 200,000 fans during its eight days at ASU Sun Devil Stadium and massive media coverage including: the NBC Super Bowl XXX Pregame Show, Today, Weekend Today, Entertainment Tonight, Extra, Late Show with David Letterman, The Tonight Show, Nickelodeon, SBTv on TNT, QVC, Comedy Central and Len Berman Super Bowl Special

NFL Properties greatly appreciates AVIAD's involvement with our premiere postseason promotion program and your flexibility, candor, and good cheer throughout the entire Super Bowl experience.

Thanks again.

Regards,

NFL PROPERTIES, INC.

A handwritten signature in cursive, appearing to read 'Don Garber', written over a horizontal line.

Don Garber
Vice President
Business Development/Special Events

NFL PROPERTIES, INC.

A handwritten signature in cursive, appearing to read 'David Newman', written over a horizontal line.

David Newman
Senior Director
Special Events

cc: C. Schwartz/NFL Properties



U.S. Department
of Transportation
**Federal Aviation
Administration**

Flight Standards District Office
Civil Air Terminal
Hanscom Field
Bedford, MA 01730-2616

APR 29 1998

To All Boston Marathon Flying Participants

Dear Ms. Rocha:

I am writing to all of you to express my sincere thanks and appreciation for the outstanding display of professional flying which you conducted over and around the Boston Marathon on April 20, 1998. The absence of a "TFR" did give rise to some unexpected occurrences,.....Smart Routes?? The orbiting direction of some rotary winged aircraft may have been perpetuated by an unintentional but instinctive desire to rotate the opposite way due to the operator's hemispheric roots. However, the courtesy, communication, and heads up flying which all of you displayed has had me walking pretty tall for the past few days. I was especially impressed with the banner tow operators throughout the day. From my vantage point with Dick Bunker in MASS 02, I observed you folks doing some outstanding flying, from absolutely nailing your altitudes and your horizontal spacing to your superior communication procedures over the entire race course.

I'm sure there were some items of concern that you all may have observed and that we could improve upon for next year. Please take a few moments to write down your ideas and send them to me. Tell us what was good and what was not so good. In the absence of a "TFR" it will be our own responsibility to insure that flying over the Boston Marathon remains as uneventful as possible.

If you have any questions concerning this correspondence please call me at (781) 274-7130 from 8:00am to 4:00pm Monday through Friday. Thanks to all for a great day of flying.

Sincerely,

A handwritten signature in cursive script that reads "Bill Wicks".

Bill Wicks
Aviation Safety Inspector
Operations, NE-FSDO-01