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Docket management system
U.S. Department of Transportation
Room Plaza 401
400 Seven Street.,SW
Washington, DC 20590-0001
Docket # F A A -- 2000 -- 8274; Notice No. 0 0 -- 1 3

To Whom It May Concern,

This letter is in response to the proposed rulemaking governing temporary flight restrictions (TFR). We've been in business for 12 years towing aerial banners, this is our livelihood. Your proposal as written will harm General aviation. It will diminish or bankrupt aerial advertisers and impact aerial photographers and the News media. The TFR's must be revised in order to be fair and workable. In all honesty, it has been my observation professional pilots, including aerial banners towers, are up to date with respect to current regulations. Of minor concern would be the weekend aviator, who may not take the time or know where to find the latest temporary flight rules. That said, temporay flight rules would be of little value, but would create more paperwork. There are currently several safeguards already in place. For example, control towers are a good source for information, announcements can be made over Atis, Fight Watch may be contacted for information.

With regards to safety over demonstrations, I whole heartedly except the creation of TFR's over airshows, the combination of sudden changes in direction, high speed and concentration, decrease the pilots ability to see and be seen. Special event scenarios are quite different. Banner towers fly in a set pattern, at low speed and are in constant communication with each other. Banner towers operate under current FARs, in addition must possess a special Waiver. This Waiver specifies weather minimums, altitudes and number of aircraft over an event. Safety is not an issue here, after 12 years and thousands of hours. I've never witnessed an incident over an event. To my knowledge there are no known negative statistics which involve special event banner towing.

The real issue concerning these TFR's is money and power. A few powerful and well financed organizations want control over special events. This will eliminate competition. These few groups in turn will allow their own advertisers such as blimps and helicopters to charge astronomical amounts of money. In-stadium advertising costs can also increase. In addition, banner towers may be allowed over events, after royalties are paid. The scenario is not new, it has occurred in isolated areas. With TFR's in place, it will become common practice. The bottom line is, a few powerful, well financed organizations are using the FAA as a pawn to achieve their goals.

What effect will these special event TFR's have? Banner towers will be hardest hit, with most companies simply going out of business. There are approximately 600 banner companies in this country. These companies earn approximately $1 million annually. Further, a ripple affect will occur, causing more lost revenue and jobs. Such as banner equipment makers, aircraft maintenance, pilot pay and fuel cost. In addition, many pilots fly aerial banners for time building, these pilots then become airline pilots.

In summary the FAA should not allow TFR's with respect to flights over special events to become law. TFR's with respect to airshows would be a prudent step toward the advancement of aviation safety. A portion of the FAA's job is to

promote and foster "air commerce" not to diminish it. The FAA must not allow a very small group of organizations to disrupt a system which has worked for 60 years.

Respectfully,

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