

120209



BARBARA'S BANNERS & BALLOONS



Transit-Aire Aviation, Inc.

BARBARA KITCHENS

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January 4, 2001

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

Re: Docket No FAA 2000-8274; Notice No 00-13 - 54

Dear Sir,

I am owner and operator of an Aerial Advertising Company engaged in aerial advertising (aircraft banner towing). I am very concerned about the proposed changes to the current FAR's (Federal Air Regulations) that could put even further restrictions to our operations. We have been operating for over 20 years (since 1980) with no accidents or harm to anyone. Statistics show no collisions of tow planes over any outdoor event - large or small.

Our operations are governed by a special banner tow waiver after being inspected and approved by the local Flight Standards District Office (FSDO) in addition to all of the standard Federal Air Regulations (FAR). Our pilots are experienced and very safety conscious and fly outside of the event and around at a very slow speed (so that the banners can be read) and keeping other aircraft in sight at all times. We do no quick or acrobatic maneuvers. With the safety record mentioned, we feel that any additional restrictions would be over kill and unwarranted action on the part of the administrators.

Since aerial advertising isn't mentioned in the proposal, we are assuming that we will be included arbitrarily in the Temporary Flight Restrictions (TFR). These TFR's can be arbitrarily assigned to all kinds of events, thereby automatically shutting out banner towers and creating dire economic hardship - this activity is our way of making a living. We would like to continue operating as before, at all major events, except air shows, and have this right clearly defined in the regulations.

The word is out, that certain major sports team owners and/or their organizations are recommending and influencing actions that would curtail or completely eliminate aerial banner

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advertising and other entities as well, such as aerial night signs, blimps, etc. If a few questionable and perhaps greedy institutions can muster this power and use government agencies to stifle their competition – then this country is coming to a sad state of affairs! Please, let's stop this virus before it gets its foot in the door! We estimate that passage of this proposal could potentially cost our company as much as \$150,000 per year in taxable revenue. We have worked diligently for all these years, building a safe and reliable business. This business could be greatly reduced or even destroyed by some unwarranted regulatory decision. A question arises: could pressure and propaganda be coming from large event promoters, to put undue restrictions on banner towers as to make their advertising sales easier? I hope that isn't the case, but still – please give us a level playing field.

We are asking that part 91 of 14 CFR not be amended to include 91.145 as proposed, but instead should exclude major sporting events from the proposed change. Also, to request certificated banner towers to be added as 91.145(g)(7)

Your attention to this matter will be greatly appreciated. Thank you for your influence in helping our banner companies deal with this potentially devastating economic impact.

Respectfully yours,

*Barbara Kitchens*

**Barbara Kitchens**  
Owner