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DEPT. OF TRANSPORTATION

925 Balfour Street  
Midland, MI 48640  
January 26, 2001

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U.S. Department of Transportation Dockets  
Docket NO FAA-99-5483 - 72  
400 Seventh Street S.W.  
Room Plaza 401  
Washington DC 20590

Dear Sir/Madam:

Although it is well beyond the time for comments on the proposed regulation changes, I understand that final wording/interpretation is still ongoing. I am concerned mainly about the proposed wording of 14CFR, Part 65.

As written under the current Part 65, a person seeking to experience qualify for a parachute rigger's certificate must:

65.115 Senior parachute rigger certificate experience - etc.

- (a) Present evidence - etc. - he has packed at least 20 parachutes - etc. - under the supervision of a certificated parachute rigger - etc.

65.119 Master experience

- (a) - etc. - packed at least 100 parachutes - etc.  
(2) under supervision -etc.

65.125 Certificate privileges

- (a) A certificated senior parachute rigger may - etc.-  
(2) Supervise -etc.  
(b) A certificated master parachute rigger may -etc.-  
(2) Supervise -etc.

All individuals other than military riggers obtain rigger certificates through training that complies with the above process.

The proposed change to Part 65 reads:

65.125 (a) +++

- (2) Supervise - etc. - in accordance with 105.43(a) or 105.45(b)(1).

(b) +++

- (2) Supervise - etc. - in accordance with 105.43 (a) or 105.45(b)(1).

105.43 Use of single-harness dual parachute system.

- (a) specifies conditions for packing the main parachute

105.45 Use of tandem parachute systems

- (b)(1) specifies conditions for packing the main parachute.

U.S. Department of Transportation Dockets  
January 26, 2001  
Page 2

At present a certificated rigger may supervise the packing of all parachutes. Under the proposed change, it appears that only the packing of sport main parachutes (single-harness and tandem) may be supervised by certificated parachute riggers (senior or master).

How, then, are applicants for a rigger's certificate to obtain the experience required by 65.115?

I agree completely with the establishment of a definition of supervision, since I have seen some riggers over the years who felt that "supervision" is being where they can be called by telephone. However, I believe that the definition of supervision should not contain a reference to and be limited to main parachutes but should become part of 14 CFR, Part 1: Definitions and abbreviations, which would clearly establish that the term applies to all parts of 14 CFR.

If this change were implemented, I believe that Part 65 could remain as is, and the supervision area of Part 105 would be addressed.

Sincerely,



B. M. Dolley  
Master Rigger & DPRE 1552237