

Proposed FAR 91.1053A.2.i requires that the pilot-in-command of a fractional flight in large turbine powered multi-engine aircraft have an airline transport license and a first class FAA medical certificate. As the flights are not considered commercial operations and are not held out to access by the public, I believe that to require the pilot-in-command to have an airline transport license and a first class medical certificate would cause undue hardship. Many of the owners of fractional aircraft are pilot's in their own right, and would not be able to fly their own aircraft unless the held an ATP and first class medical.

I think that the requirement for 1500 hours a commercial license an instrument rating and a type rating (if the aircraft required a type rating) should be sufficient for this type of operation as it is much more restrictive than the current minimums for FAR part 91 non-commercial operation in large turbine powered multi-engine aircraft (currently a private pilot certificate with a type rating and an instrument rating for non-commercial operations). Although some relief is provided by the proposed regulation, it is up to the local FAA FSDO offices to issue the relief, which would be in practice a time consuming, and nationally non-uniform process.