

Federal Aviation Administration
800 independence avenue, SW
Washington DC 20591

RE: Docket Number FAA-2000-8274

To whom in may concern.

This comment is in response to the national football league's comments of 27 June 2001.

In the interest of defending freedom from what the NFL's lawyers would like you to believe is their honest concern and need for "safety", I offer the following comments.

To further the NFL's argument that the FAA should adopt these rules, one would assume they would bring to light the most damning occurrences they could find. Of the 7 occurrences that the NFL wrote of, 4 involved aerial advertising aircraft.

None of those four involved any injury to persons on the ground. The sole injury was to the pilot of #2, of which the NTSB found the probable cause to be fuel exhaustion (I'm sure the FAA already has rules in place to prevent that.)

Of those 4, the only damage reported in FAA/NTSB reports is "slight damage to an unoccupied car."

I hope the FAA will keep in mind that the date range of these incidents starts in 1976. If the NFL thinks that over 25 years: 1 minor injury to a pilot, and "slight damage to a car" is an unacceptable safety risk, maybe the NFL should reconsider their entire sport.

Again, It should be obvious to the FAA why the NFL wants to limit/prohibit advertising-not-controlled-by-the-NFL around their stadiums.

Concerning the NFL's woefully inaccurate reporting of their #6 occurrence:

The incident report reads as follows:

General Information

Data Source:	FAA INCIDENT DATA SYSTEM
Report Number:	19980927032269G
Local Date:	09/27/1998
Local Time:	13:40
City:	PHILADELPHIA
State:	PA
Airport Name:	
Airport Id:	

Event Type: INCIDENT - GENERAL AVIATION
Mid Air Collision: *NOT A MIDAIR* [my emphasis]
Aircraft Information
Aircraft Damage: NONE
Phase of Flight: FCD/PREC LDG FROM CRUISE
Aircraft Make/Model: PIPER PA-18-A150
Airframe Hours: 4029

Narrative

[aircraft], WAS ONE OF TWO [company] BANNER TWO AIRCRAFT OVER VETERAN STADIUM WORKING THE LOCAL CONTROL EAST FREQUENCY (118.5). AT APPROXIMATELY 1738 UTC, THE PILOT REPORTED TO HIS COMPANY AIRCRAFT ON 118.5 THAT HE WAS GOING DOWN. THE OTHER AIRCRAFT DECLARED AN EMERGENCY TO PHILADELPHIA TOWER AND TRIED TO RELAY AS MUCH INFORMATION AS POSSIBLE. THE LOCAL CONTROLLER TRIED TO ASCERTAIN THE POINT OF LANDING SO EMERGENCY EQUIPMENT COULD BY DISPATCHED. THE AIRCRAFT LANDED IN THE ACME PARKING LOT. THE EMERGENCY EQUIPMENT REPORTED PILOT UNINJURED, THE AIRCRAFT SUSTAINED NO DAMAGE, CAUSE ENGINE FAILURE.

Where did the NFL get the idea this was a near mid-air??

I am not associated with the incident company. I am somewhat familiar with the incident. The engine failure resulted from the failure of a part approved by the FAA through the exhaustive STC process for this Standard Category aircraft.

The NFL's lawyers point out the number of paid attendees to their games.

What numbers have their legal department worked out as far as revenue they lost to the aerial advertising companies?

Where is the safety problem?

I have yet to identify one which would be fixed by this NPRM.

How many NFL fans have been killed while flying in the highly regulated 135/121 air transportation industry?

It seems that NO fans have been killed / injured by aerial advertising.

How many in-stadium billboard deals have been killed by aerial advertising?

Many.

I hope the FAA will take my comments into consideration,

Respectfully,

William Kline

