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Docket Management Systems
US Department of Transportation
Room Plaza 401
400 Seventh Street, SW.
Washington DC 20590-0001
RE: Regulation of Fractional Aircraft Ownership Programs and On-Demand Operations
Docket number FAA 2001-10047

September 21, 2001

To Whom It May Concern:

I believe that since the FORAC was formed without the valuable perspective of pilots or a pilot group, the NPRM should be voided and a new committee developed. Simply hearing pilot's perspectives via this comment period will be far from sufficient in creating regulation for the fractional industry.

Numerous areas of vital importance to safety deserve to be given pilot input and critique. One such area is duty/rest periods. *"The FOARC believed that the stringent requirements in many cases, exceeded those imposed on air carriers..."* This statement from the NPRM, however, does not mean that the requirements for fractional pilots will be safer than those for airline crews as it suggests. I believe that the demands of flying within fractional programs are greater than those found within the air carrier environment. Additionally, this issue has been the subject of blame in recent airline accidents and is being carefully scrutinized to determine if the regulations are safe enough as they are currently written.

How can the FOARC committee have been "fairly balanced" without pilots participating in the process? I believe that if pilot's perspectives were part of the committee, the FORAC recommendations would be quite different. I understand that the comment period of any NPRM gives the opportunity of those not involved in the origin of the regulation to voice their concerns. However, this NPRM is so vast that mere comments to the FOARC recommendations will be muted against such a large document.

I respectfully request that this NPRM be voided and the process started over with pilots appointed to the committee.

Sincerely,

Steven K. Becker

