

I am a pilot for a major Fractional Ownership Program. I feel these operations should be regulated under 14 CFR 135. Here are a few reasons why I believe they should be.

1) The owners in these programs do not have any operational control. All they do is make a phone call to schedule a flight and write a check once a month. They are "commercial" operations, not "private".

2)The FAA has been talking about "one level of safety" for many years. Now they have a chance to make that happen. The flight crews need better protection with their flight and duty times. Also, when on "reserve", there needs to be a period of duty and rest. You cannot be ready for duty during a 24 hour period, and still be safe.

3) I also believe aircraft should be required to have TCAS II installed. This is a "one level of safety" issue. We are starting to see much larger aircraft being operated by the fractionals.

Thank you