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FAA-01-10047-9



**COLUMBIA HELICOPTERS, INC.**

August 2, 2001

Docket Management System  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh Street S.W.  
Washington, DC 20590-0001

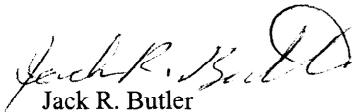
Docket No.: **FAA-2001-10047; Notice No. 01-08**

SUBJ: Regulation of Fractional Aircraft Ownership Programs and On-Demand Operations.

First I have no objections to the inclusions that you suggest for Part 91.509 regarding Survival Equipment for **over-water operations** due to the fact that it places an altitude requirement into the regulations, but, I do strongly object to the change to Part 135.167 Emergency equipment: **Extended over-water operations**.

1. Title 14 CFR Part 1 is very specific in its definition of "**Extended over-water operations**", by including the terminology that you have you are making an exception to the definition.  
In the past 3 years we have run into the situation while dealing with certification matters where as the FAA has stated that if a definition does not exist for a specific word that word can not be utilized. In conjunction with this if there is a definition, you have to abide by the definition with out deviation unless you apply for an exemption and it is approved.
2. If this deviation is left in you are setting a precedence that non-fractional operators can legally fight to get an exemption to this Part.
3. You are needlessly jeopardizing lives by allowing this exception. Even with the altitude requirement, in the event of a pressurization failure along with an engine or other mechanical problems you could end up with numerous survivors in the water with out a means of possible survival.
4. In closing I would suggest strongly that you do not change the definition of **Extended over-water operations** by allowing this exception. I would instead insure that the Document Management System personnel and AGC-200 has in place an approval for any Fractional Ownership group to request and receive an exemption. Note this exemption should not be given to any operators flying 121 operations.

Sincerely  
Columbia Helicopters, inc.

  
Jack R. Butler  
Asst. Chief Inspector QC

JRB/jb