

I would like to commend the FOARC for a thorough investigation into the world of Fractional Ownership with many useful and applicable suggestions to improve safety.

I DO, however, have some substantial concerns relating to the size of the program involved. I have recently been gathering information and interested parties to form a small-scale fractional ownership operation involving, potentially, 3 small companies going in on one light twin aircraft. The fractional ownership idea is the only way that a small company could otherwise afford a corporate aircraft. As a lower-time commercial pilot / CFI trying to organize this with much excitement, I was very dismayed to read this docket which would, for all intensive purposes, extinguish this dream. Specifically, 91.1053 (flight crew experience), although applicable for airlines and regionals, I don't feel that a minimum of 1,500 hours is necessary for a small-scale fractional ownership operation. I have about 800 hours, many of which were in a part 91 corporate operation with enough experience to tackle the job. However, if this docket becomes regulation, I would have to drop the idea entirely.

Improving safety in the air should always be a main concern for all involved in aviation, but PLEASE don't forget about the small operations which can get burried by regulation.

Thank You