

October 18, 2001

Mark Houser
810 North Market Street
Kenton, Ohio 43326

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 # FAA 2001-10047

Ladies and Gentlemen,

I am a pilot for a large fractional ownership company. It is my opinion that this NPRM be voided and the process started anew. The very idea that the FOARC was "fairly balanced" without NON-MANAGEMENT pilot representatives from the four largest fractional ownership providers is ludicrous!

I take contention with the following key points of the NPRM:

- 1) Elimination of required weather reporting for airport operations conducted by frax operators.
- 2) Elimination of the 60% landing rule for frax operators.
- 3) Duty/rest requirements for frax operators. Those contained in the NPRM are inadequate.
- 4) The idea that "owners" have operational control is laughable. Ask any NON-MANAGEMENT fractional pilot his/her opinion of who has operational control. The frax company has operational control.

This NPRM is of MONUMENTAL importance to the safety of all current and future fractional operations! All of us have witnessed a mere glimpse of the gargantuan enterprise of fractional ownership. Let's have the foresight to start this process over again with representation from the pilot group. Until that time, all fractional operators should be required to operate under 14 CFR 135.

Thank you for your time.

Sincerely,

Mark W. Houser