

Allied Jet, Inc. provides on-demand charter services. The proposed regulation is unworkable and would cause an economic hardship on air charter operators, while providing little improvement in security.

1. With the compliance deadline approaching, program requirements are not described in sufficient detail. Templates are not yet available, and operators would have insufficient time to comply.

2. The 12,500 pounds designation is inappropriate; perhaps a better designation would be aircraft with more than 19 passenger seats.

3. The ground security coordinator designation would be unworkable and impractical. On-demand operators fly to thousands of airports often on a moments notice. The pilot-in-command would be the only practical individual to serve in this capacity.

4. The requirement that a law enforcement officer be available is unworkable, a financial burden, and ill-defined.

5. The provision for limiting access to the "flight deck" is not practical, is a serious safety problem, and would not improve security. Most "doors" are not secure in the first place. The safety of the pilot and the crew would be adversely compromised, since the pilots have no way to exit the aircraft if the door is jammed, and the crew must be in constant contact with the passengers.

6. Most aircraft do not have the air-to-ground communications capability to comply with the notification requirement.

7. In many cases with some aircraft (12,500 lbs GTOW), a passenger may occupy a co-pilot seat.

In general, we live in a free society, which may necessarily entail risk to the traveling public. On-demand charter operators provide a needed service for businesses and individuals requiring non-air carrier airports, often short notice, and flexibility and ease of travel. For the most part these services are provided in small aircraft where the elaborate security procedures outlined in this regulation are both impractical and unnecessarily costly. This proposed regulation is bureaucracy at the extreme. Furthermore, this proposed regulation will stifle air taxi travel, limit efficient business travel, place an undue burden on Part 135 operators, and is "using a cannon to shoot a nat," while doing little to improve real security.