



Grand Junction Steel
A DIVISION OF **tumac industries inc.**

DEPT. OF TRANSPORTATION
DOCKETS

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June 20, 2002

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

Reference: Docket Number FAA-2002-12261-8

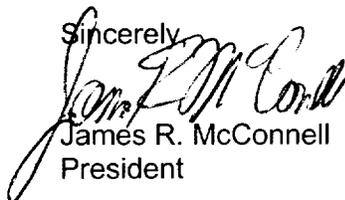
Gentlemen:

As an owner/operator of a small business jet I wish to comment on the significant economical impact that the FAA proposal for DRVSM will have on my company. I have received a quote of approximately \$138,000 to upgrade my Citation 500. This represents approximately 10% of the hull value of my plane. I would need to fly approximately 1380 hours at optimum altitude in order to recover the costs of updating my plane. Financing this update will be difficult due to the fact that the update will add little value to the plane. As a small business owner in harsh, post 9/11 times I will most likely be unable to afford the update therefore I will be relegated to the second class status of the lower altitudes. This will mean poorer fuel consumption and longer diversions around weather. I will be forced to either make extra stops for fuel or push the safety envelope for takeoff weights and/or emergency fuel reserves. I am sure I will choose the conservative option of extra fuel stops however I cannot say that all of my fellow pilots will do the same.

While I would hope that implementation of the DRVSM rules below FL 350 would be delayed indefinitely I understand that is unlikely. I was dismayed to learn that the FAA has chosen to ignore the consensus plan that was presented in February of 2001, which advocated a phased in implementation based upon a "judicious review of the program based upon actual experience". This approach would allow the FAA the opportunity to base the implementation upon real world conditions such as the reduced air traffic following the events of 9/11. By collapsing the window by at least two years the FAA is causing the cost of updating to rise due to excessive demand. A phased in approach will allow small business owners like myself time to prepare for the significant financial impact and to schedule the update during routine maintenance while still providing three more flight levels for the major airlines and updated business jets.

I strongly urge you to reconsider your decision abandoning the phased in implementation and I thank you for considering my comments. If you have any questions I can be reached at (970) 242-4015.

Sincerely,



James R. McConnell
President