

I concur with the safety benefits of the proposed rule!, though don't feel a reasonable assessment of the rule has been considered with respect to suggested change of Appendix G of Part 91 Section 2 "Aircraft Approval" [h] "Turbo propeller Aircraft Operated Under Part 91 Equipped With a Single RVSM Compliant Altitude Measurement System".

Per page 31925 of the proposed rule making it indicates that this allocation has been assessed on the basis of low volume and frequency of these categorized aircraft and air traffic control has the provisions in assisting pilots that experience equipment failure.

I suggest that Turbine powered aircraft constructed and certified in accordance with FAR 23 Normal category also be considered and recognized under the provision of this same rule change. The volume of these type aircraft also are minimal and frequency in flight levels above 290' would be seldom.

We currently operate under part 91 a Cessna Model 525 "constructed per Part 23" and two transport category aircraft. Though this 525 is certified with a max. altitude limitation of 410' we rarely operate above 330' due to its range and certain weight limitations. The cost implication of upgrading avionics and addition weight penalties to meet the proposed rule is economically unreasonable, considering that the aircraft only flies in the envelope above 290' 6% of the time. We are currently RVSM certified with one of our two transports and anticipate having the other qualifying to meet the requirements because these aircraft operate in the 290' and above envelope regularly.