

Although there are several typographical and syntax errors in the wording of the proposed regulation, I agree with the basic concepts put forward in the NPRM. The obvious safety advantages inherent in this new technology brings with it the possibility of greatly reduced accident/incident events related to weather and night operations. We have included the EFVS equipment in one of our aircraft and will outfit all future aircraft similarly. Although our company operates only under Part 91 of the FARs, I can't see why there should be any difference between Part 91 and Part 135, 121, etc. I would think that the FAA would want to encourage operators of every stripe to weigh the advantages and cost benefits of this technology and not have to consider a dubious limitation on beginning an approach based on reported visual conditions that are made irrelevant by the availability of EFVS. EFVS offers so much more for the operator in avoidance of runway incursions, night operations in unfamiliar terrain, safe approaches in marginal conditions and situational awareness that it should. be given every opportunity to be incorporated into everyone's fleet without penalty.