

I have several concerns about the possible rescinding of part 125. Part 125 serves a few, but unique operations that do not fit the mold of part 121, 135 or 91. The typical part 125 operator may only operate a couple of aircraft for a very limited and specified mission and does not hold out to the public. If forced into part 121 the management infrastructure alone could be over burdensome to these small operators. Some operators will voluntarily operate to part 121 standards, however they do not incur all of the expenses resulting from the many administrative and regulatory compliance associated with part 121. A part 125 operator who voluntarily complies with the operating standards outlined in part 121 is complying with a personal high degree of operating professionalism, not because they are required to. Operators who have these high personal standards will exceed all regulatory requirements; those that don't have high standards usually have regulatory compliance problems, as well as accidents.

Due to the lack of highway and road infrastructure in Alaska heating oil for the typical village must be transported by aircraft. In most cases these are part 125 operators, who either utilize the aircraft as a method of delivering the fuel for their own fuel sales business or contract with the fuel sales company to deliver the product. These services are accomplished via contractual agreements between limited parties and are not held out to the public. If costs go up, the end user pays the difference, which is typically a poor Alaskan village. Life in these small villages depends upon a successful and reliable aviation industry for survival. Over regulating these operators will only create a situation where it will become necessary to cut corners or cease operations. This will have a detrimental impact on safety and create unnecessary expenses and hardship for the Alaskan Bush community. Changing attitudes, increasing training and upgrading technology will improve safety, adding more regulations will not solve the safety problems facing our industry.

Having made the above statements, I now pose the following questions

1. Why has it been determined that these sweeping changes are necessary?
2. What will happen to current part 125 operators if it is abolished?
3. What data supports such sweeping changes?
4. Why implement radical changes and increase regulations when compliance with current regulations is at issue?
5. Why implement major changes when closing loopholes and implementing minor changes to existing regulations will have a greater impact on safety?

Thank You
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