

Section 6 (Minimum flight altitudes) of SFAR71 should be amended to read:  
"Minimum flight altitudes will be in accordance with FAR 91.119 or FAR 135.203  
as appropriate." The 1500 foot minimum currently included should be deleted as  
it is cumbersome and counterproductive, i.e., it drives you up into the clouds  
when the weather is marginal.

Further, visibility minimums for SFAR71 should be in accordance with FAR 91.155.  
The current 3-mile visibility requirement is unrealistic and burdensome beyond  
reason.

All other sections should remain unchanged.

Thank you,

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Captain

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