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PAPILLON
AIRWAYS, INC.

DEPT. OF TRANSPORTATION
DOCKETS

2003 SEP 22 A 11:15

September 8, 2003

FAA-2003-14830-223

U.S. Department of Transportation
Federal Aviation Administration
Docket Management System
400 7th Street, SW Nassif Building, Room PL-401
Washington, DC 20591-0001

sent via facsimile
202-493-2251

SUBJECT: Hawaii Helicopter Air Tour Industry Petition to Amend SFAR 71
FAA-2003-14830 RIN 2120-AH02

Dear Appropriate Administrator:

My name is Elling Halvorson and I am the most recent chairman of the Helicopter Association International and was the owner of Papillon Hawaiian Helicopters prior to its sale in 1995.

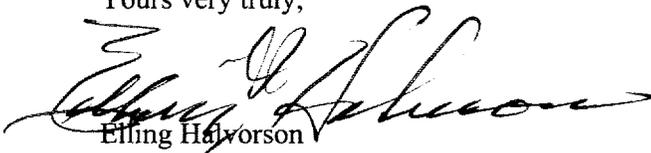
Since I have been an operator in the Hawaiian Island, I am quite familiar with the climatic conditions that prevail there. My letter today is to request that you reconsider the SFAR 71 which requires a 1500-foot altitude restriction with only deviation in certain FAA approved locations. Although I am not operating in the Hawaiian Islands at the present time, I do have an interest in the safety of those who are operating there. SFAR 71 compromises the safety standards that the FAA is attempting to improve.

Because of the 1500-foot restriction, there are circumstances where airplanes are flying below helicopters, which is contrary to all logic. Furthermore, the height restriction in many cases requires pilots to compromise their safety because of the fast weather changes that occur particularly on the windward side of the islands.

I would recommend that in populated areas of the islands the 1500-foot altitude be maintained, however, in the remote areas of the islands, I believe it would be appropriate to allow 300-foot altitude. We must allow the pilots to use their best judgement and not be intimidated by a rule that lacks flexibility. We know that the pilot will instinctively try to live by the rule, even to their potential compromise of safety before making a judgement call to violate the spirit of a rule.

Thank you for the opportunity to present my views on this significantly important issue.

Yours very truly,


Elling Halvorson

EH:md

C/ David Chevalier