

The opportunity for pilots to gain experience and time in pursuit of a flying career continues to become more difficult. The adoption of this rule would limit the options of career seekers to basically flight instruction. With the overreaction in the General Aviation field to the events of 9-11 (Admiral James Loy, head of the Transportation Security Administration, on October 17th told the House Aviation subcommittee that "we're getting to the point" when the government will need to rethink many of the restrictions placed on aviation since the September 11 terrorist attacks. Loy said in the highly emotional period right after the attacks, it was suggested by some security officials that the threat posed by general aviation was much greater than it actually is.) the FAA has almost eliminated banner towing which was one source of "time building" and now threatens to eliminate the chance to gain experience by conducting site seeing flights. As a flight instructor I would agree that 200 Hours is not sufficient time/experience for some pilots to be giving rides to the public, but if you, as the FAA, have issued Commercial Certificate to them they are supposed to be competent to conduct such flights safely.

The requirement of operating these operations under Part 135 in stead of Part 91 is also the "kiss of death" to the site seeing business and this NPRM under the guise of "safety" does not support conclusive data that this rule would increase safety other than the opinion that if we stay on the ground the public will be safer. Of the 11 accidents cited in the NPRM, eight occurred in Hawaii, and most were apparently already operating as Part 135 flights already. Maybe the FSDO in Hawaii should be looked into.

The only reason for the existence of the FAA is to regulate a thriving aviation arena in this country, not to strangle it until no one is allowed to fly and the FAA does not exist.

In the spirit of the celebration of the Centennial of Flight please reflect upon the freedom that allowed the Wright brothers to do what they did and imagine them trying to do that today.

That you for the opportunity to comment.