

While the pursuit of safety in aviation is the goal of everyone, this current approach does not meet such a standard. This rule change will have substantial adverse impacts on small operations like mine without any additional increase or positive change to aviation safety. I conduct several such 25 mile operations per year and have done such for many years without the aid of the proposed additional requirements, all without incident or accident. The net effect of these new requirements will be to deprive needed revenue for small operations and decrease public service without any increase in safety. These changes will significantly curtail small business activities in local communities that need the economic activity that is provided by such sight seeing operations. Please reconsider both the charity and the 25 statute mile issue.