

I am NOT in agreement with your Notice of Proposed Rulemaking which will require all 91 sightseeing operations to be conducted under Part 135. We have been flying Part 91 air tours for six years safely and without difficulty. Your proposal will create a costly tour environment for the customer and will force many companies out of business. If you want a more direct involvement with all tour operations, then I suggest that you consider other options. Consider the size of the operation. If there are more than 3-4 aircraft operating the tours, then the 135 ticket may be appropriate. As a better alternative, why not simply require a separate air tour certification for 91 operators that will help protect the public without having to endure the entire 135 certification process. Most operators will find (as we have over the years) that the FAA will not be readily available to assist with their air charter needs and in some cases (as in a Key West operation) there will be no local FSDO within hundreds of miles. The 135 certification process was intended for COMMERCIAL AIRLINERS... let's work on a way to increase safety under a NEW PLAN.. not something that was intended for large carriers. We would like to see the current exemption detailed for sightseeing operations within 25 miles of a primary airport left unchanged.