

Our flying club provides local airplane rides as a significant part of our airfield's annual fundraising efforts to support the airfield management (which I believe is a not-for-profit entity). We (pilots) donate our time and aircraft time for this purpose. For my membership in the club (since 2000) and have not known of, or heard of any, incidents or accidents ever occurring as a result of these fundraising activities which are currently under Part 91. Our airfield, 3C1 is a small, non-towered, public use field that is primarily funded by club membership contributions and community fundraisers.

1) My experience volunteering (as a non-pilot) for these fundraisers leads me to believe that the revenue generated from these fundraisers is proportional to the volume of air traffic served. I have not seen a lack of people waiting for an airplane ride. If the minimum experience limitation is raised from 200 hours to 500 hours, that will substantially reduce the number of pilots willing and available to provide these airplane rides, and thus substantially affect the revenue generated and ability of 3C1 to sustain itself.

2) What is the rationale of increasing this requirement in light of the adverse impact on not-for-profit revenue generation potential?

3) Is there a purposeful differentiation in this rule, as proposed, that would not provide the part 119 exemption to not-for-profit as opposed to the nonprofit organization exemption proposed?