

I am pleased to submit comments on the subject Docket (4521, National Air Tour Safety Standards).

The changes proposed are not supported by evidence included in docket (statistical standards, Bayesian methods). Of the 11 anecdotal items mentioned, 8 appear to be operating in compliance with part-135 standards already, and outcome would not have been changed by the subject proposal. Further direct evidence is required to justify these changes, if driven by statistical rationale alone.

One change also stands out as inconsistent with other operating expectations: Proposed minimum pilot qualifications seem non-aligned with current commercial practice.

Similar operations are routinely--and safely--conducted with commercial/instrument airmen, min 250 hr, and such an airman can also be instructing in complex/high performance/multi-engine aircraft as well.

I would propose these alternate airman qualifications:

- 1) min 500 hr; OR
- 2) min 250 hr with instrument rating appropriate to aircraft used; OR
- 3) certificated flight instructor with 10 hr in type of aircraft.

I am not in the air-charter business, and hold no business stake in the current proposal.

Thank you for the opportunity to comment on this proposal.

Don W. McClure, P.E.
Consulting Engineer