Another knee-jerk reaction by the FAA. It's obvious that of the very few accidents referred to, that there appears to be some local problems associated with such things as 'no life preservers over water', 'lack of briefing by pilot', etc... Common sense dictates that these items should be accomplished by the responsible parties and it would appear to me to be somewhat of a localized problem. In typical FAA fashion, rather then address the local issues, you want to completely change an FAR that works very well. You also compare statistics between commercial (part 135) and general (part 91) operations regarding total accidents but do not reflect anything regarding total hours flown in these two kinds of operations. I would ascertain that you can not prove that part 135 is any safer then part 91 in these operations? You also fail to mention any economic impact to the many local operators who currently offer part 91 tours? I feel very strongly that this NPRM is not justified, would substantially impact the already ailing general aviation business community, and that the same results could be accomplished thru other means. I sincerely hope that as written, this NPRM is reconsidered as stated.