

Docket Management Facility
US Department of Transportation,
400 Seventh Street, SW.
Nassif Building, Room PL-401
Washington, DC 20590

Docket Number **FAA-2003-16526: Notice No. 03-12**

Comments to the Notice of Proposed Rule Making.... Stage 4 Noise.

The FAA initiative in the implementation of the Stage 4 noise rules is to be applauded.

DISCUSSION

The rule making does however continue to ignore the noise levels of the Business Jet sector. The emphasis of the existing and proposed rules is to impose the noise regulations only to aircraft that exceed 75,000 lbs. This was applicable to Stage 2, Stage 3 and is proposed to continue into Stage 4.

This emphasis on the heavier airliner which typically operates from a major hub, or the large airports in the contiguous USA, this leaves residents who live adjacent to the smaller, regional business airports unprotected from excessive noise levels generated by older generation aircraft that fall below the 75,000 lb threshold weight. Interestingly these smaller regional or business airports/airfields are typically surrounded by residential developments and is the reason that new airports to support the major airline traffic were built in the 70's and 80's to move their expanding operations out areas adjacent to the down town and residential areas.

The business aviation community has been using the existing rules to continue to operate older business jet aircraft that are below the 75,000 lbs threshold limit and do not comply with Stage 3 noise limitations. Maybe there is a miss construed notion that the lighter the aircraft the lower the noise level. That is not true. Compare the following

	Take off Weight	Noise Level	
Boeing 747 400	820,000 lbs	83.2 dBA	STAGE 3
BBJ	171,000 lbs	74.2 dBA	STAGE 3
BBJ-2	159,000 lbs	71.8 dBA	STAGE 3
Gulfstream GII/GIII	69,700 lbs	82.8 dBA	STAGE 2
JetStar 1329	42,000 lbs	88.7 dBA	STAGE 2
Sabreliner	21,000 lbs	87.9 dBA	STAGE 2
Lear 25	15,000 lbs	82.8dBA	STAGE 2

For a given aircraft group, Stage 2 or Stage 3 then there is a general relationship between noise and weight. Higher the weight, the higher the noise limit is, and generally the noisier the aircraft.

The regulations as currently written and as the NPRM states, there continues to exist the opportunity for these noisy business aircraft to continue to operate at the expense of residents and workers.

The FAA are not providing any protection for residents who live adjacent to these business airports, the FAA have not, and the new proposals show the FAA is not protecting “everybody, equally”.

PROPOSED CHANGE TO NPRM

Make Stage 3 and 4 noise levels applicable to all transport category aircraft irrespective of certified Take Off weight.

**Aircraft not complying with Stage 3 are to be compliant by Jan 1, 2006.
Aircraft for which the Type Design application is received on or after Jan 1, 2006 are to comply with Stage 4.**

OPTIONS TO OPERATORS

There are Stage 3 conversions “Hushkits” available for the Lear 25 and Gulfstream GII, GIII aircraft. Operators have not purchased these Hushkits as Stage 3 compliance is not compulsory.

Sabreliner, Phase out
Jetliners, Re-engining program certified.

The introduction of Stage 3 noise limitations to all jet aircraft will stimulate economic activity; Increased manufacture of Hushkits, re-engining activity and replacement old equipment with new. All of the above are positive economic benefits.

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