

This NPRM, if enacted will have a serious effect on general aviation. Both introduction and charity flights will be essentially eliminated across the country by the onerous conditions proposed.

The statistics cited are not representative of the broad spectrum of operations that reflect the majority of general aviation flying done for compensation. Helicopter crashes in Hawaii are a problem that needs to be addressed via the Part 135 rules that are already in place. Subjecting Part 91 operations to expensive and complicated standards will appear to improve total safety statistics in that such flying will be almost completely eliminated. Employment cuts as the result of the implementation of these rules will serve to injure an already weak segment of the aviation economy and are totally unjustified. Thank you for considering my comments.