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The proposed changes to part 119.1(e)(6) are unnecessary, to achieve a heightened level of safety. As shown in the NPRM itself, the part 135 operators actually have a worse fatality rate than the part 91 tour operators. There is no need for the tour operators to be certificated under part 135 to increase safety. If you feel the need to add regulations to do this, then add regulations under the **exception** that would increase the safety of the tour operations. Don't take away the opportunity for a person to experience aviation without having to buy an airline ticket to do so. If the proposed rule becomes law it will put many tour operators out of business. The costs of becoming a 135 certificate holder would not outweigh the amount of business received. This proposed rule's intent is to increase the safety of commercial tours, if your intent is such, then attack the safety issues. Don't make an operation fall under a new set of regulations in hopes that these safety issues will work themselves out. (THEY WON'T) instead of spending the money implementing a new rule, let's take the time and resources and find out what the safety problems are with these operations and fix them. If all you do is implement a new rule the old problems will still exist.