

RE: Docket Number FAA-1998-4521

Dear Sir or Madam:

I strongly oppose the changes proposed in this NPRM, it is onerous and misguided.

It will negatively impact charities that benefit from sightseeing, drive many small businesses out of existence, and harm this nations strong aviation community in a deep and permanent way.

This will drive small business into failure, and negatively affect tens of thousands of business and charities. The Analysis of Costs section of this document is so misguided that the Small Business Administration even takes issue with it. Far more than 1670 business will be affected by this NRPM. Driving all sightseeing operations to Part 135, and eliminating the 25 nm sightseeing exemption is onerous, and clearly does not serve safety, there must be some other driver of this draft NPRM.

This proposal is so out of line I must assume that those that drafted this NPRM are entirely politically motivated, are on a personal vendetta against specific charities, general aviation, or small businesses. This NPRM clearly has nothing to do with safety.

Since seven of the ten accidents reported were in Hawaii, I surmise that the FAA may be trying to cover an appalling, fatal, weakness in an area FISDO by this draconian nation-wide proposal. Or, I realize that our overly complex and self serving government requires white wash at times, and must generate fantastic headlines about their incredible protection of the ignorant masses, but please white-wash your shortcomings, or do your political duty to whoever is demanding it, or protect the FAA's budget with some other non-onerous method. I suggest focusing on some of the POSITIVE achievements of the FAA and aviation community, like CAPSTONE, the dramatic reduction in runway incursions, WAAS, or the Airport Watch program. Surely these victories can be spun into serving whatever need drove this NPRM, because we all know in the aviation community, its main driver is not "safety".

Docket FAA-1998-4521 is not a document that comes from a balanced, well meaning-government, it is not something I would expect to see adopted in a free and open democracy, please do not adopt these changes.

Sincerely
James Garvin