



**AIRCRAFT OWNERS AND PILOTS ASSOCIATION**

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January 13, 2004

Docket Management System  
U.S. Department of Transportation  
400 Seventh Street, SW  
Room Plaza 401  
Washington, DC 20590-0001

Re: Docket No. FAA-1998-4521; Notice of Proposed Rulemaking (NPRM); National Air Tour Safety Standards

The Aircraft Owners and Pilots Association (AOPA), representing over 400,000 general aviation pilots and professionals nationwide, requests that the Federal Aviation Administration (FAA) provide at least a 90-day extension of the comment period on the proposed rule affecting numerous general aviation operators. Doing so would also allow the FAA to accommodate the public meetings, as requested by AOPA, members of Congress, and several other organizations. We are extremely concerned that the FAA has failed to consider the true impact of this proposal on the general aviation community and contend that conducting face-to-face public meetings and extending the comment period will give Agency officials the opportunity to hear directly from those most affected.

Following the release of the proposal, AOPA received immediate strong member response that this proposed rule will have an adverse impact on thousands of general aviation pilots and small aviation businesses. Based on this feedback, and the fact that the current NPRM comment period has been impacted by three national holidays, AOPA contends that affected operators require additional time to respond to the proposed rule.

AOPA is in the process of conducting a series of surveys to determine the extent of the NPRM's adverse impact on thousands of general aviation pilots and small aviation businesses. Preliminary survey results indicate that the FAA's proposal to increase the minimum flight time for private pilots participating in charitable sightseeing events from 200 hours to 500 hours reduces the pool of available pilots to help in charity and fundraising flights by 20 to 25 percent.

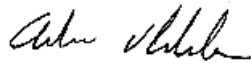
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In addition to the charity flights issue, our data indicates that the FAA has underestimated the adverse economic impact on the sightseeing elements of the proposed rule. Many of these companies are also involved in flight training, a segment of the general aviation community that continues to face economic hardships. AOPA argues that the FAA should provide these entities with additional time for comments and the opportunity to explain first-hand how the proposal affects their operations and determine the accuracy of the FAA's analysis of the proposal.

Sincerely,



Andrew V. Cebula  
Senior Vice President  
Government and Technical Affairs

cc: Andrew Steinberg, Chief Counsel, FAA  
Nick Sabatini, Associate Administrator, Regulation and Certification, FAA