

Where is the real justification for this rule? There is no evidence that charity flights require a pilot with 500 hours, and indeed, no justification in the document whatsoever.

The "evidence" cited includes numerous flights ALREADY OPERATING under Part 135, making the argument for prohibition of all Part 91 sightseeing flights totally invalid.

Why is the FAA determined to force small GA operations and aspiring GA pilots out of the air? As a flight instructor under 500 hours, I am personally affected by this ruling, which in my opinion does nothing to enhance flight safety and everything to stifle Part 91 businesses.

I urge you to abandon this proposed rule as being unnecessary and totally unsupported by the evidence presented.