

I am a pilot with a single engine land commercial certificate. I have 3000 hrs flying time. I fly a Cessna 180. I am part owner of an Exhibition Skydiving Team and fly skydivers for fun and for exhibitions.

Since 9/11 it has been harder to get exhibition jumps into large outdoor events like NFL football, Nascar races, etc.

We do operate in the class B airspace at Kansas City and have a good working relationship with the controllers there. But I am worried that if the Washington DC ADIZ becomes permanent, then other class B airspaces may follow.

I know for a fact that the only reason Nascar wanted a TFR around their tracks is because it would keep out the banner towers. You see, they don't get any advertising revenue from the banner towers. The first year that the Kansas City Speedway opened we jumped into all of the races up to 9/11. The comment was made many times how they didn't want the banner towers around the speedway because they couldn't get any revenue from their advertising.

The Washington DC ADIZ is operationally unworkable and imposes major burdens on pilots and ATC. There is no security from this arrangement.

No general aviation aircraft has ever been used in a terrorist attack. And the government has determined that not a single ADIZ incursion was terrorist related.

Protecting the Washington DC area can be achieved with the existing requirements for the 15 mile Flight REstricted Zone (FRZ), but lighter aircraft, flying at slower speeds, should not be subject to the current ADIZ requirements for filing a flight plan, obtaining a unique transponder code and maintaining two-way communication with air traffic control.

The proposed rule is flawed because the evaluation of the economic and operational impacts on pilots and aviation businesses and an analysis of alternatives are insufficient.