October 2, 2014

Docket Operations
U.S. Department of Transportation
West Building Ground Floor, Room W12-140,
Routing Symbol M-30
1200 New Jersey Avenue SE,
Washington, DC 20590

Re: Docket No. FAA—2014-0463
Policy on the Non-aeronautical Use of Airport Hangars

The U.S. Parachute Association submits these comments on behalf of nearly 37,000 members who enjoy and support the sport of skydiving, an FAA aeronautical activity known as “parachute operations.” Some 235 U.S. operators also affiliate with USPA; nearly all of them are located on an airport, with more than half of them on publicly owned airports, and many of them located on federally obligated airports. These operators provide the aircraft and the facilities for skydiving, which could be directly affected by the FAA proposed Policy on the Non-aeronautical Use of Airport Hangars.

These businesses are of all sizes and activity levels. Some are weekend-only businesses with one or two small aircraft and some part-time help; others are seven-day-per week, 365-days-per-year operations offering multiple turbine aircraft and employing dozens of people. Regardless of size, in many cases these skydiving operations are a significant economic and activity generator for the local airport where they are based. They provide revenues to the airport and the local community, they bring visitors and activity to the airport, and they are a reason many non-aviators from the local community come out as spectators and develop an appreciation for “their” local airport. Collectively in the U.S., these businesses host more than 3 million individual parachute jumps by experienced skydivers and more than 500,000 first-time jumps by the public. Revenues from all such parachute operations are estimated to be in excess of $150 million annually nationwide.

Our members have a strong interest in the FAA assuring that skydiving operations continue to be recognized as an aeronautical activity, having its rightful place in the National Airspace System, including the nation’s airports. Overall, the proposed policy will serve our members well, especially those interested in opening a new skydiving business. Airport sponsors have told business proponents that no hangar space is available, while hangars were used for storage of non-aeronautical items. Nevertheless, we have identified a sentence of the proposed policy that lacks clarity. It has been italicized for emphasis within the proposed FAA policy.
Proposed Policy and Request for Public Comment:

3. The primary purpose of a hangar in an aeronautical area of the airport is aircraft storage or operation of an aeronautical service business that requires maintenance or repair work on aircraft. If a hangar is serving one of these purposes, then incidental storage of non-aviation items that does not interfere with the primary purpose of the hangar and occupies an insignificant amount of physical hangar space will not be considered to constitute a violation of the grant assurances. In such cases, incidental storage of non-aviation items will be treated as having de minimis value (for purposes of compliance with the self-sustaining assurance) and will not require the sponsor to increase rent as a result of the storage of these incidental non-aeronautical items.

USPA comment: USPA believes the sentence emphasized in italics is too narrowly focused. Skydiving is an FAA aeronautical activity that requires maintenance or repair work on parachutes as well as aircraft. FAA certificated parachute riggers pack, and supervise the packing of parachutes in airport hangars. Skydiving businesses commonly use hangar space for training purposes. This could include a classroom setting that often utilizes video to teach new skills and to review a student’s performance during post-skydive debriefings. Students are also taught emergency procedures in a hanging harness that’s usually located within a hangar. Parachute systems used by staff and students are typically stored within hangars in lockers that minimize their exposure to sunlight, dirt, and petroleum containments that would compromise their structural integrity. Further, the process of organization and recordkeeping of parachutes and skydivers is usually conducted in a designated office area within a hangar. It’s where a skydiver would go to be manifested on a specific flight. Skydiving businesses also store aircraft in hangars, where they conduct FAA-mandated inspections.

USPA feels strongly that any proposed policy guidance be crafted in a way that’s more inclusive of all aeronautical users, rather appearing to be restrictive. This could be achieved if the sentence in italics ended after the words, “aeronautical service business.”

The primary purpose of a hangar in an aeronautical area of the airport is aircraft storage or operation of an aeronautical service business, that requires maintenance or repair work on aircraft.

Sincerely,

Randy Ottinger
Director of Government Relations

The United States Parachute Association is a voluntary, not-for-profit association dedicated to the safe enjoyment of skydiving. www.uspa.org