Bush Air Cargo dba

GOLDEN ERA Aviation

P.O. Box 3363 o Palmer, AK 99645 o 907-230-8204 o Info@goldeneraaviation.com

To:

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

DEPARTMENT OF TRANSPORTATION
2021 SEP 21 P 2:52
DOCKET OPERATIONS

September 14th, 2021

Re: Request for exemption of 14 CFR §11.81 for Golden Era Aviation **Part 91 ID No.: G63JAL03**

Dear Sir or Madam,

I am writing you in accordance with 14 CFR §11.81 to seek relief from 14 CFR §91.147(a).

(a) Name and contact:

Nicolai von Pronay
P.O. Box 3363
Palmer, AK 99645
907-230-8204
Info@goldeneraaviation.com
Goldeneraaviation.com
Part 91 ID No.: G63JAL03

(b) The specific section or sections of 14 CFR from which you seek an exemption:

14 CFR §91.147(a) 25 SM limitation

(c) The extent of relief you seek, and the reason you seek the relief:

We are seeking relief from the 25 SM radius for flight seeing limitation in 14 CFR §91.147, because the radius severely limits our ability to provide sightseeing due to the speed of the aircraft and it puts us into one of the busiest VFR traffic areas in Alaska, the Knik Glacier Valley, increasing the chance for a traffic conflict. Over the years multiple midair collisions have occurred in this area. We are operating the flight

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seeing tour under an LOA (Part 91 ID No.: G63JAL03) and we would like to increase the limit for the tour 25 SM to 100 SM.

(d) The reasons why granting your request would be in the public interest; that is, how it would benefit the public as a whole;

Granting us an exemption will enhance safety, because it will let us operate in an almost non-congested area, and de-conflict the area around the Knik Glacier and the Susitna Valley. It will benefit the public because our operation in Palmer is bringing in people from all over the world that are excited to fly aboard our historic aircraft. That brings in revenue to the city of Palmer, its gift shops, restaurants, and hotels. Palmer is relying heavily on tourism to keep the local businesses open.

(e) The reasons why granting the exemption would not adversely affect safety, or how the exemption would provide a level of safety at least equal to that provided by the rule from which you seek the exemption;

Like stated above, the exemption would not adversely affect safety, it would actually raise the safety level since we would be able to climb to a higher altitude, as well as being able to leave the Knik River Valley which is a very congested airspace with a high concentration of non-ADSB and non-radio equipped aircraft in addition to multiple helicopter flightseeing tours. In fact, it is so congested that the FAA created a CTAF for the valley. While it helps with situational awareness, most of the aircraft operate without ADSB or radios. The DC-3 is a commercial airliner which has a two-pilot crew, two dependable engines, and it operates at speeds almost twice of the Cessna's and Piper's in the area. Being able to leave the 25 SM will bring us over to Prince William Sound, which is an area that has virtually no VFR traffic and therefore greatly reduces the chance of a midair collision.

(f) A summary we can publish in the Federal Register, stating:

(1) The rule from which you seek the exemption; and

(2) A brief description of the nature of the exemption you seek;

(g) Any additional information, views or arguments available to support your request; and

(h) If you want to exercise the privileges of your exemption outside the United States, the reason why you need to do so.

Golden Era Aviation is seeking relief from 14 CFR 91.147(a) extending the allowable radius for the flight seeing from 25 SM to 100 SM. Allowing Golden ERA to operate away from the outside the 25 SM will enhance safety and lessen the chance of a traffic conflict, since the airspace 25 SM around Palmer

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(PAAQ) is one of the busiest uncontrolled VFR traffic area in the nation. Company aircraft would be transitioning above the area while avoiding the aircraft practicing landing on unimproved strips without radios or ADSB. Golden Era's aircraft are faster than typical sightseeing aircraft such as the DeHavilland Beaver or various civilian and military helicopters. Granting the deviation would allow the Golden Era aircraft to separate from these slower aircraft. Golden Era does not seek this exemption for outside the United States.

Please feel free to contact me anytime with questions, concerns, or comments.

Thank you for your time.

Best regards,

Nico von Pronay
President
Golden Era Aviation
907-230-8204
Info@goldeneraaviation.com
Goldeneraaviation.com
Part 91 ID No.: G63JAL03

Attachment:

- FAA Letter of Authorization

U.S. Department
of Transportation
Federal Aviation Administration

14 CFR Part 91 Operations

Letter of Authorization

Summary of Authorizations

The operator, in accordance with the reference documents, is authorized to:

	Reference Paragraphs
Conduct commercial air tour operations under 14 CFR Section 91.147.	A049

HQ Control: 08/31/2004 HQ Revision: 000

This Waiver or Authorization is Issued by the Federal Aviation Administration and approved by direction of the Administrator.

Digitally signed by Thomas S. Palmer, Principal Operations Inspector (AL03)
[1] EFFECTIVE DATE: 5/10/2021, [2] AMENDMENT #: 0
DATE: 2021.05.10 18:11:24 -05:00

I hereby accept and receive this Waiver or Authorization.

_____ _____

Nicolai Andreas von Pronay, Agent for Service Date