

From: [Kevin Dice](#)
To: [Bobbie Walthall](#)
Subject: Fwd: Comments on Proposed Parachuting Policies in Advance of Tuesday's Meeting
Date: Tuesday, February 06, 2018 12:18:47 PM
Attachments: [kevin-dice-comments-on-proposed-parachute-policies-2018-02-06.pdf](#)

Please my comments on parachuting policy (attached), and please see that this document is added to the online public record.

More detail is included in the forwarded email below, which I sent to the commission yesterday.

Thanks,

Kevin Dice

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From: Kevin Dice
Sent: Monday, February 5, 2018 11:04:01 PM
To: shaunsmith_99@yahoo.com
Subject: Fwd: Comments on Proposed Parachuting Policies in Advance of Tuesday's Meeting

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From: Kevin Dice
Sent: Monday, February 5, 7:30 AM
Subject: Comments on Proposed Parachuting Policies in Advance of Tuesday's Meeting
To: sboley@lawrenceks.org, llarsen@lawrenceks.org, lsoden@lawrenceks.org, jananda@lawrenceks.org, matthewjherbert@gmail.com
Cc: peek@industrologic.com, rvalverde@ljworld.com, wes@marketmediallc.com

Dear Commissioners,

Please see my attached comments on the proposed "Policies and Procedures for Parachute Operations" which you have been asked to approve tomorrow by the Aviation Advisory Board.

I strongly recommend you not approve these policies.

Rather than just complain to you about the shortcomings of these policies, I have proposed amendments with justifications and sources well-cited. I hope you will find them useful in deciding the path forward on this issue.

Please feel free to reach out any time tomorrow if you'd like to discuss. (I have no classes on Tuesday, so literally any time works.) My phone number is (618)-580-7603.

I will do my best to send you comments on the proposed "Minimum Standards for Commercial Aeronautical Operators" by 5pm today. As you might imagine, I oppose those too as they are currently drafted. While I enjoy being able to assume good-faith between my own skydiving operation and the city of Abilene, Kansas, I think it is in the common interests of the City of Lawrence and all parachute operators, given the history of this issue in Lawrence, to make sure that any legislation you pass is worded to be abundantly clear and irrefutably equitable.

I am happy to help to that end.

It has been disappointing to see that the Aviation Advisory Board has largely ignored extensive public comment from the 4 October 2017 meeting, with the exception of fixing a single typographical error. The drafts are otherwise unchanged.

I realize that you, the commission, are not the enemy here, but I want to emphasize that further prolonging of this process at the hands of the Aviation Advisory Board will result in "increased motivation" in the form of further correspondence with the FAA. Please be reminded that as a federally funded airport, KLWC has an obligation not to discriminate against any type of aviation activity, and to do so, whether by direct prohibition or "death by red tape", is to jeopardize future funding.

Skydiving operations can absolutely be conducted safely at Lawrence Municipal Airport. I have personally jumped at more than 20 airports, and if Lawrence were added to my list, it would not nearly be the busiest. While I hear and respect the concerns of other KLWC operators, much of their concerns are rooted in fear, uncertainty, and doubt. Skydiving operators, too, are safety conscious and reasonable aviation users. The FARs and USPA BSRs provide a framework for the safe coexistence of skydiving and other forms of General Aviation. It works elsewhere, and it can certainly work in Lawrence.

Blue Skies,

Kevin

Kevin Dice

President, Skydive Kansas State
USPA Static Line Instructor, Coach
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5 February 2018

Commissioners, City of Lawrence

City Hall
PO Box 708
Lawrence, KS 66044

Dear Commissioners,

With this document, I submit my feedback on the proposed **Policies and Procedures for Parachute Operations**¹ (hereafter, “**P30**”) as recommended for approval on 14 December 2017 by the City of Lawrence Aviation Advisory Board (AAB).

In general, the issues I find with these policies revolve around 4 themes:

- Unenforceable vagueness
- An extraordinary logistical burden placed upon parachute operators which is not equally imposed on operators of other aviation activities
- Incorrect interpretations of parachuting FARs, despite the existence of clarifying documents (Advisory Circulars, published by the FAA)
- The lack of well-defined timelines for notifying parachute operators of policy changes

In addition to considering the shortcomings of these policies, my hope is that you will use my constructively proposed amendments to achieve a timely passing of a reasonable, unambiguous, mutually beneficial policy on parachuting operations at Lawrence Municipal Airport.

For the record, let it be noted that the AAB did not make any changes to the **Policies and Procedures for Parachute Operations** document in response to *extensive* public comment received at the 4 October 2017 meeting, with the sole exception of correcting a typographical error. Namely, the error was a duplication of FAR 91 listed in **P30** item #1. It would appear more than 1 hour of public commentary from October remains to be considered.

¹ Policies and Procedures for Parachute Operations:
https://assets.lawrenceks.org/assets/boards/aab/files/links/KLWCParachuteprocedures_v3.0.pdf

- 1) “Parachute Operators must meet all requirements of the applicable Federal Aviation Regulations (FAR), including, but not limited to FAR Parts 61, 65, 91, 105, and 119.”

This is reasonable. Though, it is also redundant. The FAA investigates and adjudicates alleged FAR violations, not the City.

- 2) “No parachute operations shall be permitted at any time that a Temporary Flight Restriction (TFR) is in effect at the Airport.”

A TFR is by definition a prohibition of aviation activities. TFRs are commonly issued for large sporting events such as NCAA Division 1 football games. Because the Lawrence Municipal Airport is within 3 nautical miles of KU’s Memorial Stadium, all operations there are affected.² The TSA regularly grants waivers to allow aviation operations in a TFR area.

Should the City of Lawrence impose a prohibition of operation, regardless of TSA waiver status, exclusively on parachuting but not all other aviation activities, such an exclusive prohibition could be ruled a violation of the “Exclusive Rights” provisions in the FAA Airport and Airway Improvement Act of 1982 and the Airport Improvement Program.

Advisory Circular 150/5190-6 “Exclusive Rights at Federally-Obligated Airports”³ spells out clearly that **loss of federal airport funding** is a consequence of “Exclusive Rights” violations.

Proposed amendment for P3O, item 2:

“No parachute operations shall be permitted at any time that a Temporary Flight Restriction (TFR) is in effect at the Airport **unless an appropriate TFR waiver is obtained from the TSA.**”

² Sporting event TFRs apply to a 3 nautical mile radius and last from 1 hour before the event to 1 hour after.

³ https://www.faa.gov/documentLibrary/media/advisory_circular/150-5190-6/150_5190_6.pdf

- 3) “During Airport special events that may result in increased use of transient aircraft, the City of Lawrence may temporarily curtail the use of the Airport for parachute operations. The Operator will be notified in advance, in writing, of any such temporary suspension of the Operator’s approval to use the airport.”

Exclusively prohibiting parachuting during high use periods is patently an **“Exclusive Rights”** violation.⁴ Prohibitions of activity must apply to all aviation activities or none of them.

Proposed solution for P3O, item 3:

Delete it. Assume a safety-conscious parachuting operator will evaluate a high traffic situation and make a good-faith judgement to voluntarily suspend parachuting activities. As a parachute operator myself, I certainly would.

- 4) “No parachute operations shall be permitted at night, as defined by FAR Part 1.1 - Definitions.”⁵

FAR 105.19⁶ allows night jumps provided each skydiver displays a light, visible for at least three statute miles, from the time of parachute opening until landing. In conjunction with section 6-4 “Night Jumps” of the United States Parachute Association Skydiver Information Manual⁷, there is a well established protocol for performing nighttime skydives.

Prohibiting only parachute operations from operating at night (and not all other aircraft) is patently an **“Exclusive Rights”** violation.

Proposed solution for P3O, item 4:

Either:

- a) **Delete it**, avoiding an “Exclusive Rights” issue

OR

⁴ See Advisory Circular 150/5190-6 “Exclusive Rights at Federally Obligated Airports”: https://www.faa.gov/documentLibrary/media/advisory_circular/150-5190-6/150_5190_6.pdf

⁵ In FAR 1.1, night is defined as “the time between the end of evening civil twilight and the beginning of morning civil twilight, as published in the Air Almanac, converted to local time.” FAR 1.1: <https://www.law.cornell.edu/cfr/text/14/1.1>

⁶ FAR 105.19: <https://www.law.cornell.edu/cfr/text/14/105.19>

⁷ https://uspa.org/Portals/0/files/Man_SIM_2018.pdf (See pages 127 - 128)

- b) Amend it to say: “No parachute operations shall be permitted at night, as defined by FAR 1.1 - *Definitions*, **unless such operations are conducted in accordance with FAR 105.19 - *Parachute operations between sunset and sunrise*, USPA Basic Safety Requirements (BSRs) and USPA guidance on night jumps, as described in the Skydiver’s Information Manual (SIM), section 6-4.**”
- 5) “All parachute operations must be conducted within a 2 nautical mile radius centered on the geographic center of the Airport’s designated drop zone”

This is vague. If “parachute operations” refers to skydivers between the time of aircraft exit and landing, then it is reasonable. If “parachute operations” refers to a jump aircraft in a climbing pattern, then it is unreasonable.

At my skydiving operation, we regularly travel as far as 5 miles from the airport while climbing. This is standard, and many operations elect to circle even farther out while climbing. FAR 119.1⁸ allows commercial flights which begin and end at the same airport and have certain waivers applied (flying without passenger seats as in skydiving) to be conducted within a **25-statute mile radius** of that airport.

If “parachute operations” does indeed refer to the jump aircraft, then an unequally applied restriction of operation radius ventures into “Exclusive Rights” territory.

Proposed solution for P3O, item 5:

Clarify intent or delete. Distance to the home airport during jump operations is already well regulated by the FARs.

KLWC’s proximity to a Kansas City Center-controlled jetway is not grounds for such a limitation. A dropzone in Waldron, MO at Noah’s Arc Airport operates next to the same jetway and 4 miles from MCI with success. Controlling this jetway is a function of Kansas City Center Air Traffic Control, should *not* be a concern of the City of Lawrence, and is *not* relevant to the parachuting policies at hand.

- 6) “The Operator will only conduct parachute operations to the drop zone that is designated by the City of Lawrence. No parachutist shall be permitted to land on any aircraft movement surface of the Airport.”

⁸ FAR 119.1 (see e.2): <https://www.law.cornell.edu/cfr/text/14/119.1>

The first sentence could be interpreted to disallow operations at off-airport locations, such as in the case of a professional exhibition skydive. **This likely is not the intended interpretation.**

Advisory Circular 105-2E⁹, section 6 *Parachute Operations Onto Airports*, subsection (2) *Parachute Landings on Airports* clarifies FAA intent with respect to aircraft movement surfaces of the Airport. To quote this section:

“Airports may designate suitable parachute landing areas. **While skydivers attempt to land in such areas, at times there may be inadvertent landings in other grass or hard-surfaced areas.** This could include landings on runways, taxiways, and other hard-surfaced areas. **Areas such as runways, taxiways, clearways, and Obstacle Free Zones (OFZ) are not prohibited areas but should not be designated as a primary landing area and should be vacated as soon as practical.** Flying a parachute over runways at low altitudes should be avoided where possible. The FAA recommends that airport management work with parachute operators to develop standard operating procedures (SOP) for activities conducted by parachutists. Airports that receive or have received Federal funding or grant assurances may have additional requirements or restrictions to parachute landing areas. For additional information, refer to Order 5190.6; AC 150/5190-7, Minimum Standards for Commercial Aeronautical Activities; and AC 150/5300-13, Airport Design.”

- FAA AC105-2E.6.c.2¹⁰

(Emphasis mine)

The FAA acknowledges that inadvertent landings on aircraft movement surfaces may happen, clarifies that such areas **are not prohibited areas**, and recognizes that parachutists are competent enough to vacate such areas as soon as possible.

Furthermore, USPA training at all levels emphasizes safety on airports and around aircraft. Parachutists are highly motivated to land safely, are very aware of the dangers of landing on aircraft movement surfaces, and will do everything in their power to land in the designated area or identify and land in a safe, alternative landing area.

⁹ Advisory Circular 105-2E:
https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_105-2E.pdf

¹⁰ Advisory Circular 105-2E:
https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_105-2E.pdf

Proposed solution for P3O, item 6:

“The Operator will **make a good-faith effort to** only conduct parachute operations **onto** the dropzone that is designated by the City of Lawrence. **Recognizing that this may not always be possible, the City of Lawrence requests that the Operator, its agents, and its customers make a good-faith effort to select a safe alternative landing area and avoid landing** on any aircraft movement surface of the Airport **when possible and will vacate such aircraft movement surfaces as quickly as possible and safe to do so.**”

- 7) “The designated drop zone may be modified for the purpose of Airport expansion or other projects at the discretion of the City of Lawrence.”

This is reasonable. Please consider adding a provision for notifying all parachute operators in writing at least 10 days from the effective date of modification. This will afford the operator enough time to thoroughly communicate the change to all experienced parachutist customers.

Proposed amendment to P3O, item 7:

“The designated drop zone may be modified for the purpose of Airport expansion or other projects at the discretion of the City of Lawrence. **The City of Lawrence shall be required to provide written notice to all parachute operators at least 10 days in advance of modification of the designated drop zone.**”

- 8) “Operator shall not permit parachutists to cross any aircraft movement area of the Airport unless they are properly escorted.”

This is vague. The term “properly escorted” is left undefined. Once again, the FAA, via Advisory Circular 105-2E section 6.c.2¹¹, recognizes the competency of parachutists to safely navigate an active airport. USPA training specifically addresses crossing aircraft movement areas.¹²

Proposed solutions to P3O, item 8:

- a) **Delete in the interest of consistency with the FARs and their intent as clarified by Advisory Circular 105-2E.**

¹¹ Advisory Circular 105-2E:

https://www.faa.gov/documentLibrary/media/Advisory_Circular/AC_105-2E.pdf

¹² See USPA SIM Section 4-Category B, subsection F for guidance on crossing aircraft movement areas: https://uspa.org/Portals/0/files/Man_SIM_2018.pdf (page 43)

OR

- b) **Amend it to:** “Operator shall **ensure that parachutists exercise caution in crossing** any aircraft movement area of the Airport **and do so in accordance with USPA training. Operator shall make a good-faith judgement as to the necessity of escorting parachutists across such aircraft movement areas of the Airport.**”
- 9) “No automobiles or any other vehicle except for authorized emergency or maintenance vehicles shall be permitted inside of the fenced perimeter of the Airport.”

With respect to policy #8, it is common in the skydiving industry to use golf carts or all-terrain vehicles to escorts jumpers quickly and safely over aircraft movement surfaces.

Proposed amendment to P30, item 9:

“No automobiles or any other vehicle except for authorized emergency **vehicles**, maintenance vehicles, **and vehicles used to escort parachutists across aircraft movement areas** shall be permitted inside of the fenced perimeter of the Airport.”

- 10) “The Operator shall ensure that all parachutists are at least 18 years of age.”

This is reasonable. A note to bear in mind: On rare occasion, the USPA may grant a waiver to the 18 year old requirement so that a terminally ill minor may skydive. The City of Lawrence can cross that bridge if/when the time comes and decide whether to allow such an exception to this City policy.

- 11) “All parachutists shall be required to sign a release of liability on a form acceptable to the City of Lawrence that releases the City of Lawrence from any and all liability arising out of their parachuting activity at the Airport.”

Reasonable, so far.

Policy #11 continued....

“A copy of all such release forms for each parachutist shall be provided to the City of Lawrence prior to permitting said parachutist(s) to participate in parachute operations at the Airport.”

This is problematic. Skydiving operations are most active on weekend days.

City of Lawrence offices are generally closed on weekends. In skydiving, walk-in customers are common, and requiring advanced submission of hard-copy waivers to the City of Lawrence on a weekday is not a reasonable request as Operator will lose walk-in business. **A potential solution is for Operator to execute waivers digitally¹³ and share instant electronic access to these waivers with the City of Lawrence.**

Proposed amendment to P3O, item 11:

“All parachutists shall be required to sign a release of liability on a form acceptable to the City of Lawrence that releases the City of Lawrence from any and all liability arising out of their parachuting activity at the Airport. A copy of all such release forms for each parachutist shall be provided to the City of Lawrence prior to permitting said parachutist(s) to participate in parachute operations at the Airport. **The City of Lawrence shall designate a representative to receive physical copies of releases during Operator’s business hours of Saturday and Sunday 8am - 5pm OR The City of Lawrence shall agree to accept electronic releases from Operator.”**

- 12) “The Operator shall be responsible for the issuance of appropriate NOTAM(s) involving the airspace above the Airport as may be needed for parachute operations and will notify the Airport Manager when any such NOTAM(s) have been issued.”

FARs already require Operator to issue notification regarding parachute operations to the air traffic control facility having jurisdiction of the airspace. In practice, this is usually accomplished by issuing a NOTAM.¹⁴ While FARs do not specifically require notification to be in the form of a NOTAM, I agree that it is a good idea. No other operator for other aviation activities is required by the City of Lawrence to also notify the Airport Manager upon issuance of a NOTAM. In fulfillment of FAR 91.103 - *Preflight action*¹⁵, each pilot in command of an aircraft is required to check all active NOTAMs relevant to a planned flight. Filing a NOTAM (Notice to Airmen) should be considered sufficient **notice** to all operators engaging in other aviation activities. An Airport Manager is presumed to be capable of checking for active NOTAMs.

Proposed amendment to P3O, item 12:

“The Operator shall be responsible for the issuance of appropriate NOTAM(s)

¹³The E-Sign Act of 2000 gives electronic and written signatures equal legal validity: <https://www.gpo.gov/fdsys/pkg/PLAW-106publ229/pdf/PLAW-106publ229.pdf>

¹⁴ NOTAM: Notice to Airmen

¹⁵ FAR 91.103 - Preflight action: <https://www.law.cornell.edu/cfr/text/14/91.103>

involving the airspace above the Airport as may be needed for parachute operations. ~~and will notify the Airport Manager when any such NOTAM(s) have been issued.~~”

Note: The Airport Manager is encouraged to make a good-faith request of Operator to provide direct notification upon issuance of a NOTAM, but to codify this should not be necessary and risks an “Exclusive Rights” issue.

- 13) “The Operator shall immediately notify the City of Lawrence of any incident or accident arising out of its parachute operations that involves personal injury to any individual or property damage to any property regardless whether such injury or damage occurs either on or off of the Airport premises.”

Mostly reasonable. I don’t agree with the “off the airport” stipulation but chose not to argue it. Please do consider that no other operator of any other aviation activity has any such reporting obligation that extends beyond the boundaries of the Airport.

- 14) “On each day that parachute operations are to be conducted, the Operator shall conduct a daily briefing with the staff of the on-Airport fixed base operator (FBO) and the on-Airport medical evacuation aircraft operator including, at a minimum, the following information:
- a) Identification of aircraft and pilot(s) to be used for parachute operations
 - b) Hours of operation
 - c) Altitudes to be used
 - d) Name and cell phone number of load organizer or other designated manager of applicant
 - e) Radio frequency(s) and any other methods of communication to be used.”

Communication between aviation operators is key; however, legislating a **daily** obligation of time for the FBO staff and medical evacuation operators is perhaps not reasonable. I would anticipate certain items will be redundant from day to day, namely items (a), (c), (d), and (e). **Perhaps a provision should be made for electronic notice via email, phone call, or similar means to disseminate details of jump activities. Doing so would be less inconvenient for the FBO staff and medical evacuation staff without compromising the intent of this policy.**

Proposed amendment for P3O, item 14:

“On each day that parachute operations are to be conducted, the Operator shall conduct a daily briefing, **either in person or via an electronic means**

previously agreed upon, with the staff of the on-Airport fixed base operator (FBO) and the on-Airport medical evacuation aircraft operator including, at a minimum, the following information: a. Identification of aircraft and pilot(s) to be used for parachute operations b. Hours of operation c. Altitudes to be used d. Name and cell phone number of load organizer or other designated manager of applicant e. Radio frequency(s) and any other methods of communication to be used.”

- 15) “Medical evacuation flight operations at the Airport shall at all times be given priority over parachute operations by the Operator and their staff members. The Operator shall at all times assign personnel to monitor the status of medical evacuation aircraft operations at the Airport. If medical evacuation operations are commenced or are underway during parachute operations, the Operator shall immediately notify the pilot(s) of any aircraft to cease parachute operations and to remain clear of the area until the medical evacuation aircraft has communicated that they have left the Airport traffic pattern. If parachutists have already exited the aircraft, the Operator shall immediately communicate to the on duty medical evacuation staff that there are jumpers in the traffic pattern and shall immediately notify the medical evacuation on duty staff when all of the parachutists are on the ground and have been accounted for.”

This is reasonable. Please be reminded that **there is no FAR requiring the medical evacuation aircraft to stay on the ground until all jumpers land.** To do so is at the sole discretion of the medical evacuation aircraft pilot. In this situation, Visual Flight Rules (VFR) apply, both to the medical evacuation aircraft and to the parachutists. Modern parachutes are highly maneuverable, as are modern helicopters, and pilots of both are *highly* motivated to avoid one another.

- 16) “The Operator shall be responsible to ensure that all pilots engaged in aircraft operations in support of parachute operations shall at all times maintain proper radio communications as required by FAR 105.13.”

This is reasonable but redundant. Parachute operations are governed, in part, by FAR 105.13¹⁶. The FAA enforces this, and there is no apparent benefit to the City of Lawrence including reference to it as policy.

Proposed course of action for P3O, item 16:

Delete in the interest of efficiency.

¹⁶ FAR 105.13 - Radio equipment and use requirements:
<https://www.law.cornell.edu/cfr/text/14/105.13>

- 17) “The Operator shall be responsible for establishing an appropriate emergency procedure and to communicate this procedure to all participants prior to commencing each days parachute operations.”

This is vague, however I appreciate the intent. The term “participants” is not well defined. Typically, tandem jumpers are scheduled throughout any given day and arrive at a variety of times. They each receive a safety briefing prior to their individual jump, but it is impractical to gather an entire day’s customers for a single morning briefing. Experienced jumpers, too, do not show up all at once in the morning. Just as it is reasonable and prudent for a pilot of an aircraft to periodically review his or her flight checklists, it is reasonable and prudent for a skydiver to review emergency procedures specific to his or her own skydiving gear and to review material in the Skydiver’s Information Manual (SIM).

This policy does not clearly define the type(s) of emergencies which this briefing should cover. It is common in the skydiving industry for skydivers to review the emergency procedures for a main parachute malfunction several times before each jump. Emergencies regarding aircraft are covered in the first jump course and periodically reviewed. **Reviewing emergency procedures is something which skydivers are highly motivated to do. It is recommended by the USPA and legislating it is not necessary or enforceable without detailed knowledge of skydiving.**

Proposed course of action for P3O, item 17:

- a) **Delete for vagueness and infeasibility.**

OR

- b) **Amend with:** “The Operator shall be responsible for establishing a **culture of safety to include periodic review of aircraft emergencies, safe crossing of aircraft movement surfaces, emergency procedures for various modes of parachute malfunction, formation freefall safety, parachute packing, and other safety topics as determined necessary by the Operator. In addition, the Operator shall make a good-faith effort to hold an annual Safety Day seminar in alignment with the USPA’s nationwide, annual Safety Day event, typically held in March.**”

While not strictly quantifiable, I think this proposed amendment captures the Aviation Advisory Board’s intent reasonably well without the impractical stipulation that there be a single briefing for all customers in the morning before each day of operation.

- 18) “Any events or special parachuting activities must obtain a permit from the City of Lawrence not less than 60 calendar days prior to the event. Event insurance will be required, at the sole cost and expense of the Operator.”

This is vague. From watching the 4 October 2017 Aviation Advisory Board meeting recording, I know the underlying concern of the board members might be a sharp spike in parachute traffic on the airport as a result of a large skydiving event with multiple turbine aircraft. If this is the case, **I recommend quantifying “special parachuting activities”** accordingly. **Additionally, it is unclear what “event insurance” entails.** What coverage is believed to be necessary beyond what is ordinarily obtained and required by the **Minimum Standards?**

Proposed course of action for policy #18:

Either:

- a) **Clarify the intent and underlying concerns of this policy**

OR

- b) **Delete It.**

- 19) “The Operator will develop and maintain a log of all parachute operations. This log shall contain, at a minimum, each flight conducted for parachute operations and the name(s) of each parachutist on each flight. A copy of this log will be given to the Airport Manager on the first of each month, and will be available for inspection by the Airport Manager at any time.”

While keeping such a log is standard practice for skydiving operations, it is unreasonable to furnish the Airport Manager with the personal information (first name and last name) of parachutists. **No other aviation activity at Lawrence Municipal Airport is required to furnish similar logs to the Airport Manager.** Requiring the medical evacuation business to do so would be in violation of HIPPA law. As far as I am aware, flight training operations at Lawrence Municipal Airport are not required to do so either. I find this policy unreasonable on grounds of personal information privacy, and by imposing this policy solely on parachuting operators, the City of Lawrence ventures into **“Exclusive Rights”** territory. **It may be reasonable to request summary statistics on parachuting activities,** but to request names is unjustified.

Proposed course of action for P30, policy 19: Delete it.

This concludes my comments on the proposed **Policies and Procedures for Parachute Operations**.

Please feel free to reach out to me to request clarification or ask questions about skydiving. I am a FAA-certified Senior Parachute Rigger, USPA-certified Static Line Instructor and Coach, president of a sport parachute club operation in Abilene, KS, and an experienced skydiver, making more than 250 jumps per year.

I'll be happy to provide timely critical review of future versions of this legislation, refer the commission and advisory board to relevant FAA documents, and answer general questions about sport skydiving.

Thanks for your service in municipal government and your consideration of my proposed amendments. I look forward to working together towards a swift, mutually beneficial resolution on parachute operations at KLWC.

Blue Skies,

Kevin Dice

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