Alaskan operating environment and the absolute necessity of air travel in Alaska, notes that most Alaskan operators utilize mixed fleets and employ maintenance personnel who work on all airplanes in such mixed fleets. The AACA maintains that requiring the scheduling of maintenance personnel according to part 121 standards would place an additional administrative burden and financial compliance cost on air carriers at locations with limited personnel and mixed fleets. The AACA contends that the part 121 specification of maintenance personnel duty time limitations would require the air carrier either to develop and apply separate work schedules for part 121 and part 135 mechanics or to hire additional mechanics.

FAA Response: With few exceptions, the FAA agrees with the commenters. Part 121 requires 24 hours off during any 7 consecutive days; part 135 makes no such provision. In its original assessment of maintenance and preventive maintenance personnel duty time limitations, the FAA assumed the issue to be non-controversial; the existence of union work rules, Department of Labor regulations and the generally accepted notion of a ''day of rest'' were believed to be sufficient to accomplish the same result. As a consequence, the FAA did not assess any costs associated with the burden of scheduling and providing a day of rest for part 135 mechanics as is required under part 121 where operators must ensure adequate rest for their mechanics.

The FAA maintains that mechanics, similar to pilots and flight attendants, must receive adequate rest in order to perform their duties properly and that the minimum standard required under part 121 would ensure that the opportunity for rest is provided. The FAA, however, concurs with the AACA that the extending of duty time limitations to the Alaskan operators of mixed fleets utilizing maintenance personnel under both parts 121 and 135 would be an additional cost burden. Therefore, based on cost information provided by the AACA, the FAA has adjusted its original maintenance cost estimates accordingly. The adjustment is two-fold: 1) the full cost burden inclusive of potential added labor costs were estimated for Alaskan 10–19 seat category air carriers; and 2) the administrative maintenance personnel scheduling costs without the labor cost factor were estimated for the remainder of the 10-to-19-seat non-Alaskan commuter fleet as well as the 20-to-30-seat commuter fleet.

Maintenance Recordkeeping Requirements (Recording). The AACA also criticizes the FAA's estimate of a one-time cost for compliance with the commuter rule's maintenance provisions. The AACA maintains that the one-time cost is underestimated and that there would be on-going maintenance recordkeeping costs.

FAA Response: The FAA concurs and has adjusted its original maintenance cost estimates accordingly. In this instance, however, the FAA has apportioned the added required maintenance recordkeeping costs between 10-to-19-seat and 20-to-30-seat airplanes for the total domestic commuter industry.

Maintenance Recordkeeping Requirements (Records Transfer). One commenter objects to the proposed change requiring engine and propeller total time in service to be added to the list of required recorded items. Typically, under part 121, only the total hours in service of an airplane's airframe is transferred information on older airplanes because operators have not been required to retain engine and propeller time in service data. According to the commenter, this change would necessitate operators of older 121 airplanes to undergo an extensive search of maintenance records to determine the historical times on the engine and propeller if such data is available at all.

FAA Response: The FAA concurs with the commenter. The adoption of part 135 wording imposes the more comprehensive part 135 maintenance recording requirements on part 121 operators and this might require an extensive search of maintenance records with some additional cost to an operator of older part 121 airplanes. The FAA, however, believes that any additional cost as a result of such a search would be minimal and has been taken into account with the cost adjustment provided under the maintenance recordkeeping requirements for recording addressed in an earlier comment. The FAA believes that the additional cost would be minimal because only seven existing part 121 operators of older propeller-driven airplanes would be affected by the new requirement. Typically, most part 135 operators utilizing propeller-driven airplanes already retain engine- and propeller-total-time-in-service data and most part 121 operators utilize jet-driven airplanes.

Continuous Airworthiness Maintenance Program (CAMP). One commenter estimates that the cost associated with the CAMP was considerably greater ($1.6 million) relative to the FAA's estimate to develop or revise and upgrade the CAMP ($105,000) as a result of the commuter rule.

FAA Response: The FAA does not concur with the commenter's estimate. The FAA maintains that nearly all operators of airplanes with 10-to-19- or 20-to-30-seat configurations regardless of whether operating under part 121 or part 135, are either conducting their scheduled maintenance under an approved CAMP or have adopted a CAMP as the basic guideline for their scheduled maintenance. As a consequence, the FAA based its original estimates on the cost associated with the minimum editorial changes to operators' CAMP's necessitated by the commuter rule.

The FAA however, has adjusted its maintenance cost estimates for recordkeeping requirements based on the comments already discussed and detailed above. The FAA believes the costs described by the commenter are costs associated with the new recordkeeping requirements, not administrative costs associated with the modifications to existing CAMP's.

5. Part 119

Single-Engine Airplanes. Several commenters state that the NPRM cost estimates for not allowing a passenger to sit in the co-pilot seat on a single-engine Otter are understated. One commenter states that the data the FAA used was based on national averages while all of the airplanes in question are located in Alaska. The commenters also state that the load factors and operating costs in Alaska are much higher than the rest of the country.

FAA Response: The FAA agrees with the commenters and will not prohibit qualified (as prescribed by § 135.113) single-engine airplanes, namely single-engine Otters, from carrying a revenue passenger in the copilot seat.

Proving Tests. Several commenters suggest that for operators who are switching from part 135 to part 121, the FAA should allow proving tests on revenue flights. Other commenters contend that since the airplanes they are using and the routes they are flying are not changing, the FAA should not require a proving test. Still other commenters state that the FAA's estimate of $437 hourly airplane operating costs was too low. (This rate includes crew, maintenance, and fuel costs.) The commenters' estimates range from $750 to $1,050 per hour versus the FAA's average estimate of $483 per hour for 20-to-30-seat airplanes and $463 per hour for 10-to-19-seat airplanes. Finally, some part 135 operators commented