

Appendix B: Summary of Referenced Regulatory Requirements

	General Aviation	Aerial Photography	Commercial Air Tours	
Operating Rules	Part 91	Part 91 ¹	Part 91 ² with air tour LOA ³ and Part 136 ⁴	Part 135 and Part 136
Operating Certificate	Not required	Not required	Not required	Required
Part 119 Management Personnel	Not required	Not required	Not required	Required
Operations Specifications	Not required	Not required	Not required	Required
FAA-approved Training Program	Not required	Not required	Not required	Required
FAA-approved Maintenance Program	Not required	Not required	Not required	Required
Drug/alcohol Program	Not required	Not required	Required	Required
FAA Oversight	Ramp inspection authority	Ramp inspection authority	Ramp inspection authority, record of operator, and responsibility for oversight of LOA and Part 136 compliance	Assigned inspectors responsible for routine and scheduled oversight of the operating certificate, operations specifications, training program, and maintenance program.

¹ Allowed per the 14 *CFR* 119.1(e)(4)(iii) exception for “aerial work” purposes.

² Allowed per the 14 *CFR* 119.1(e)(2) exception, which specified, in part, that each nonstop flight must be operated in an aircraft with 30 or fewer passenger seats, operate within a 25-nm radius of the airport from which the flight began and ended, and be conducted in accordance with the air tour LOA.

³ The air tour LOA required, in part, that the operator provide to the FAA its name and any other names under which it was doing business; its business address, mailing address, and principal place of business; the names of persons responsible for managing the business and for aircraft maintenance; the aircraft type, make, model, and registration number(s); and an antidrug and alcohol misuse prevention program registration.

⁴ Part 136 contained, in part, requirements for passenger briefing items, PFDs, helicopter emergency flotation systems, helicopter performance plans and operations, and operations over or near national parks and tribal lands.