June 28, 2000

Dennis B. Person
President, Helicopter Lift Services, Inc.
4676 Commercial St. SE, #182
Salem, OR 97302

Dear Mr. Person:

This is in response to your recent letter in which you requested our opinion regarding the qualifications of the person who prepares a congested area plan required by section 133.33(d)(1) of the Regulations. In an earlier opinion, we stated that the plan must be developed by the operator.

The regulations do not identify a particular employee or officer who must prepare and submit the plan for the operator. Nor do the Regulations require that the person who prepares the plan be a full-time employee of the operator. In our opinion, the operator may hire a part-time employee to prepare and process the congested area plan. It must be understood that the operator will be responsible for the actions of that employee.

Please feel free to contact me if you require any additional information.

Sincerely,

John J. Callahan
Deputy Regional Counsel