
CHAPTER 46 SURVEILLANCE OF A BANNER TOWING OPERATOR

Section 1 Background

1. PTRS ACTIVITY CODE: 1684

3. OBJECTIVE. The objective of this task is to determine if the holder of a Certificate of Waiver for banner towing operations is operating in compliance with the FAR and the terms set forth in the Certificate of Waiver. Successful completion of this task results in the continuation or cancellation of an existing waiver.

5. GENERAL. Banner towing operations generally involve flight at slow speeds while towing objects external to the aircraft around or near congested areas (e.g., outdoor sports events, stadiums, race- tracks, beachfronts, etc.) Surveillance of a banner towing operator is to ensure continued compliance with the Certificate of Waiver and its associated special provisions.

A. *Initiation of Activity.* This activity may be initiated by the district office as a result of complaints, an operator's accident/incident history, or regional or national directive or regulation. In addition, after initial issuance of a waiver, the operator should be re-checked every six months, if necessary.

B. *Restricted Category Aircraft.* Operations with restricted category aircraft must include special operating limitations which permit flight over congested areas in conjunction with towing operations. (Refer to Related Task #47, Issue a Certificate of Waiver for Restricted Category Aircraft.)

C. *Minimum Safe Altitudes.*

(1) Minimum safe altitudes must be in compliance with FAR § 91.119 **{91.79}**. However, the provisions of FAR § 91.119(d) **{91.79(d)}**, which address minimum safe altitudes for helicopters, are not applicable when a helicopter is used in banner towing operations.

(2) The inspector should be aware that operations along a shoreline may involve flight over open water for which no minimum altitude is specified. However, the aircraft may not be operated closer than 500 feet to any person or vessel in the water.

D. *Inspection.* Surveillance of the waiver holder can be accomplished by inspecting one or more of the following areas:

(1) Pilots and aircraft should be re-inspected to ensure that the waiver's list of pilots and aircraft is still current.

(2) Equipment can be re-inspected as per the inspection for initial issuance of the waiver. (Refer to Related Task #45, Issue a Certificate of Waiver or Authorization: FAR § 91.311 **{91.18}** (Banner Towing).)

(3) The inspector should observe banner pickups and drops, especially banner tow activity involving congested areas or open air assemblies of persons. (Refer to Related Task #45, Issue a Certificate of Waiver or Authorization: FAR § 91.311 **{91.18}** (Banner Towing), Section 1, paragraph 7D.)

Section 2 Procedures

1. PREREQUISITES AND COORDINATION REQUIREMENTS.

A. **Prerequisites.** This task requires knowledge of the regulatory requirements of FAR Part 91 and FAA policies and qualification as an Aviation Safety Inspector (Operations).

B. **Coordination.** This task may require coordination with the airworthiness unit within the district office.

3. REFERENCES, FORMS, AND JOB AIDS.

A. References.

- Chapter #45, Issue a Certificate of Waiver or Authorization: FAR § 91.311 {91.18} (Banner Towing)
- FAR Parts 1 and 61
- Order 8700.1, General Aviation Operations Inspector's Handbook
- PTRS Field Office Manual

B. Forms.

- FAA Form 8000-36, PTRS Transmittal Form

C. Job Aids.

- Sample letters and figures

5. PROCEDURES.

A. Pre-Inspection Activity.

(1) Review the district office file for this operator. Check the Certificate of Waiver to determine currency of aircraft type, registration number, list of authorized pilots, and special provisions.

(2) Coordinate with the airworthiness unit to inspect the aircraft, hitch, and hitch installation, if necessary.

B. **PTRS.** Make appropriate PTRS entries.

C. **Conduct the Inspection.** Use applicable portions of the FAR Part 91 Banner Tow Job Aid from Chapter 45, Issue a Certificate of Waiver or Authorization: FAR § 91.311 {91.18} (Banner Towing),

during the inspection of the banner tow operator and the banner tow operation.

(1) Verify that all pilots for banner towing operations for compensation or hire have at least a commercial pilot certificate and a current second class medical certificate.

(2) Verify that the registration certificate, the airworthiness certificate, and a copy of the special operating limitations (restricted category) are on board the aircraft.

(3) Inspect the banner and lead pole to ensure that:

(a) The weights are secured within the lead pole and that the weights at the bottom (usually lead pellets) are secure and cannot fall out.

(b) The tow ropes are not frayed, twisted, or knotted.

(c) The banner panels and their attachments are secure.

(d) The tail flag is intact.

(e) The attaching rope is the appropriate length for the operation and there is no indication of knots.

(4) Inspect the attaching device, or "hitch," to ensure:

(a) That the release cable mechanism operates easily and is snug in order to prevent premature or inadvertent release.

(b) The hitch loop fits tight.

(5) Observe at least one banner pick-up and drop for pilot proficiency.

(6) If a ground crew is used, ensure that a pre-arranged signal has been established so that the ground crew can notify the banner tow pilot of problems or malfunctions with the equipment or the banner.

C. **Debrief the Operator.** Inform the banner tow operator of the results of the inspection. Explain any safety related areas that the operator and/or banner tow pilot need to correct in order to regain compliance with the Certificate of Waiver and its associated special provisions.

D. **Satisfactory Inspection.** If the inspection is satisfactory, note the results on the job aid.

E. **Satisfactory Inspection with Minor Discrepancies.** For a satisfactory inspection that revealed some discrepancies, debrief the pilot and explain the problem areas. Make a note to the PTRS that there should be a follow-up inspection.

F. **Unsatisfactory Inspection.** Debrief the operator and/or pilot and explain the discrepancies.

G. **District Office File.** Indicate a satisfactory or unsatisfactory surveillance of the banner towing operator in the district office file. Place a copy of the Job Aid in the operator's district office file.

H. **Close PTRS.** Make appropriate PTRS entries.

7. **TASK OUTCOMES.** Completion of this task results in one or more of the following.

A. Indication to the file of a satisfactory surveillance.

B. Indication to the file of an unsatisfactory surveillance and that a follow-up inspection is required.

9. **FUTURE ACTIVITIES.**

A. Possible increase in surveillance schedule

B. Possible enforcement investigation

C. Continuation or cancellation of the Certificate of Waiver

FIGURE 46-1 FAR PART 91 BANNER TOW JOB AID

FAR PART 91 BANNER TOW WAIVER ISSUANCE AND OPERATIONS SURVEILLANCE JOB AID			
Operator Name _____ Base of Operation _____ Name of Pilot _____ Certificate # _____ Aircraft type _____ Aircraft # _____ Initial Application _____ Surveillance _____ Date Completed _____			
	Check	S	U
1. District Office Application File			
a. Verify aircraft are listed in the waiver (make/model & no.) (Use back of job aid if additional space is required) Make _____ Model # _____ Make _____ Model # _____ Make _____ Model # _____ Make _____ Model # _____ Make _____ Model # _____			
b. Verify all pilots are listed in the waiver (certificate type & no.) (Use back of job aid if additional space is required) Certificate Grade _____ Number _____ Certificate Grade _____ Number _____ Certificate Grade _____ Number _____ Certificate Grade _____ Number _____ Certificate Grade _____ Number _____			
c. Verify aircraft and pilot used are listed on the waiver			
2. Check Pilot/Operator			
a. Certificate appropriate to operation			
b. Medical certificate appropriate to the certificate			
c. EIS/AIDS checked			
3. Aircraft Inspection			

FIGURE 46-1 FAR PART 91 BANNER TOW JOB AID (con'd)

FAR PART 91 BANNER TOW WAIVER ISSUANCE AND OPERATIONS SURVEILLANCE JOB AID				
PAGE TWO	Check	S	U	N/A
a. Certificates & documents Registration Airworthiness Special Limitations (Restricted)				
b. Hitch and release mechanism				
c. Hitch installation documentation				
d. Sign mounting and light operation				
e. Placards (Restricted category)				
REMARKS:				