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THE AMERICAN KENNEL CLUB

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NOREEN BAXTER
VICE PRESIDENT
PUBLIC EDUCATION AND LEGISLATION

(919) 816-3707
(919) 816-4275 FAX

September 30, 2002

Docket Management System
U.S. Department of Transportation
400 Seventh Street, S.W., Room Plaza 401
Washington, D.C. 20590-0001

Docket No. FAA-2002-13378 - 2
Request for Extension of the Comment Period

Ladies and Gentlemen:

The American Kennel Club (AKC) is the world's largest purebred dog registry and sanctioning body for canine competitive and performance events. The AKC currently registers more than one million purebred dogs and one half million litters of purebred puppies annually, and conducts annually more than 15,000 competitive and performance events for dogs, with more than 2 million entries.

The American Kennel Club and the purebred dog fancy has a strong interest in the subject matter of Docket No. 2002-13378. Contrary to the assertion in the Notice of Proposed Rulemaking (NPRM), this proposed rule will potentially affect not only the 40 passenger air carriers who will be required to make the reports provided for in this rulemaking. It will also potentially affect all persons who ship dogs by air, including breeders, competitors and ordinary pet owners, including many members of the AKC's constituency. The measures carriers take to implement the requirements of this proposed rule could affect shippers of pet animals. To the extent that compliance with the proposed rule increases carriers' costs and/or management burden, it could affect their policies on the carriage of pet animals, thus affecting the pet owning public.

We do not believe that a 30 day comment period is sufficient for our constituency and other affected members of the public to learn about, analyze, and comment meaningfully on this proposal. The AKC's constituency consists of thousands of dog clubs and hundreds of thousands of dog fanciers nationwide who must be made aware of this rulemaking and its ramifications. We respectfully and urgently request an extension of the comment period for an additional 60 days, for a total of 90 days. We believe this extension is essential for your agency to obtain adequate comments to understand the full ramifications of this rulemaking.

We note the fact that it has taken the FAA more than 2 years since the passage of AIR-21 to develop this rulemaking. Given that fact, we do not believe it is fair to allow the public only 30 days to learn about, analyze and comment on it. Furthermore, since this rulemaking would establish a reporting requirement that has not previously existed, there is no compelling safety or other reason why a delay of 60 additional days in implementation of a final rule would be harmful.

For the above reasons we strongly urge a 60-day extension of the comment period on Docket No. 2002-13378.

Sincerely,

A handwritten signature in black ink that reads "Noreen Baxter". The signature is written in a cursive, flowing style.

Noreen Baxter,
Vice President, Public Education and Legislation

cc James W. Whitlow
Office of the Chief Counsel
FAA