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Subject: Comments to Docket FAA-I 998-4458: Notice No. 98-13

Prohibition on the Transportation of Devices Designed as Chemical Oxygen
Generators as Cargo in Aircraft

Drager Aerospace agrees that the proposed rules will enhance aircraft safety, and therefore supports the proposed rule. However, we believe there will be added costs to the aviation community, and because the preponderance of these devices are eventually installed onboard commercial aircraft, the flying public will ultimately pay. Following are reasons we believe costs will be greater:

- 1) The all-cargo operators will incur added costs due to the rule and they will be passed on to the shipper, and,
- 2) Because the annual quantity of these devices is relatively small, some or all of the all-cargo operators may not want the hassle of the rule and may refuse to carry the cargo, and,
- 3) Most of the chemical oxygen generators are installed in passenger aircraft to provide oxygen to the passengers in case of a cabin decompression. Following a decompression, the aircraft cannot be operated until the discharged generators have been replaced with charged generators. This results in an AOG condition which is normally remedied by air shipment of the replacement generators from a central stocking point, sometimes from an International location. If all-cargo shipment becomes unpredictable the airlines may need to stock quantities of the generators at multiple locations so that ground transportation of the generators can be used. This will be a significant expense to the airlines but the cost of a grounded airplane is even greater, and
- 4) Drager Aerospace is perhaps Boeing's largest supplier of chemical oxygen generators. Drager generators are manufactured in Germany and are currently air shipped to four Boeing locations in the U.S., for the reasons that the chemical generators are life-limited from date of manufacture and to reduce inventory costs. Sea freight followed by truck transport can add several weeks to the delivery date.

As previously stated, Drager Aerospace supports the proposed new rule but takes exception to the NPRM determination that there will be no additional cost to the U. S. aviation community. Our biggest concern is the future acceptance of chemical oxygen generators by all-cargo operators.

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