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NATIONAL AIR  
TRANSPORTATION  
ASSOCIATION

July 26, 1999

U. S. Department of Transportation Dockets  
Docket No. [FAA-1999-54011 -14]  
400 Seventh Street SW  
Room 401  
Washington, DC 20509

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**Notice of Proposed Rulemaking, Docket No. FAA-1999-5401; Aging Aircraft Safety Request for Comment Period Extension**

The National Air Transportation Association (NATA) represents the interest of over 2000 aviation businesses nationwide including scheduled air carriers operating under 14 CFR Part 135. The majority of these companies are small businesses whose operations are especially busy during the spring and summer. Attempting to evaluate the extensive proposal during the "high season" is difficult. Therefore, NATA requests that the comment period be extended for an additional 60 days.

Based on preliminary review of the proposal and the accompanying documentation, NATA is alarmed by the lack of support from the manufacturers of light General Aviation aircraft used in scheduled Part 135 operations. It seems likely that reverse engineering will be necessary to develop the damage-tolerance inspections programs for these aircraft if the NPRM were adopted as proposed. This requirement is anticipated to result in the costs for compliance to be far in excess of that estimated by the FAA. The extension of the comment period is necessary to better evaluate the costs not considered by the Agency.

The proposal will also substantially affect interstate commerce in many areas, including Nevada-Arizona, New England, and the Southeast. It will also potentially cripple the majority of the State of Alaska's transportation network.

In summary, the additional time is necessary to permit the industry to complete an economic analysis, audit the impact of this proposal on scheduled air carriers, evaluate the economic impact of this proposal on aviation businesses, and to develop meaningful comments to this crucial proposal.

Sincerely,

Andrew V. Cebula  
Vice President