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City of Phoenix
AVIATION DEPARTMENT

DEPT. OF TRANSPORTATION
DOCKET SECTION

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August 4, 1999

U.S. Department of Transportation Dockets
Docket No. FAA-I 999-5924 -10
400 Seventh Street, SW
Room Plaza 401
Washington D.C. 20590

Dear Sir or Madam:

The City of Phoenix Aviation Department wishes to offer the following comment regarding 14 CFR Part 139, Year 2000 Airport Safety Inspections; proposed rule:

4. Vehicle Readiness.

This requirement contradicts existing procedures for limiting air carrier operations. 139.319(h)(1) currently requires the certificate holder to limit air carrier operations within 48 hours if the required index level capability is not restored. The 48-hour requirement in place is reasonable and sufficient. There is no logical reason to treat airports any differently during this period than any other.

We believe any temporary change to the existing regulation will create unnecessary confusion and should be deleted.

Thank you for the opportunity to comment.

Sincerely,

DAVID KRIETOR
Acting Aviation Director

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