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CHIEF COUNSEL  
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On behalf of the Huntsville-Madison County Airport Authority, operator of Huntsville International Airport, the following comments are made with regard to the notice of proposed rulemaking for Year 2000 Airport Safety Inspections.

1. Several of the Part 139 airfield systems identified by FAA as being critical to airfield safety and efficiency are owned by FAA. In the list identifying Part 139 airfield systems there is wording to the effect that if the system is owned by FAA, then it is not the airport operator's responsibility. However, the wording in the NPRM does not make this distinction. Will FAA have the same responsibility to test Part 139 airfield systems they own on January 1, 2000, at least one hour before the first air carrier operation is scheduled to occur? Will local FAA Airways Facilities representatives be reporting these results directly to FAA or will the airport operator be required to acquire the FAA Airways Facilities results, integrate with the airport results and communicate the cumulative report?
2. The NPRM does not state when the results of the January 1, 2000, testing must be communicated to FAA. Will the results need to be communicated regardless of whether there are discrepancies or not?

Sincerely,  
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