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CHIEF COUNSEL
RULES DOCKET

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Priority: Normal
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Subject: Correction: Comments on Docket No. FAA-1999-5924-19

July 28, 1999

Comments on Docket No. FAA-1999-5924
Year 2000 Airport Safety Inspections

The Hillsborough County Aviation Authority as owners and operators of Tampa International Airport offer the following comments pertaining to the notice of proposed rulemaking "Year 2000 Airport Safety Inspections"

It is a good management practice for any agency or company to become aware of potential concerns that may threaten their operation, alleviate or correct the concern, and prepare for contingencies. This policy of good management is not unique to the Y2K concern and is reflected in the existing

day-to-day operations and procedures. The provisions of FAR Part 139 provides a regulatory standard that has been determined to be reasonable and

acceptable in addressing the necessary components and procedures for maintaining a safe airport operation. One would have to question, what is the uniqueness of the Y2K concern that would mandate an exception to the safety standard? Specifically, why should the 48-hour grace period to repair or replace an inoperative ARFF vehicle be removed for this concern?

Based on the ARFF manufacturer's certification of vehicle Y2K compliance, individual inspection, and to our knowledge no documented discovery of any problem with ARFF vehicles, we do not expect an ARFF failure associated with

the clock turning past the year 1999. However we are concerned that to require an airport to modify their ARFF vehicle back-up plan whereby the vehicle must be replaced "immediately", will have significant operational and financial repercussions.

FAR Part 139 requires that all replacement equipment have "at least equal capabilities". ARFF vehicles are unique as to agent and water carrying capabilities, flow rates and speed requirements as detailed in FAA specifications. These proposed regulations would require every airport that

desires to maintain their ARFF Index to essentially duplicate their Index. Contrary to the statement in the Proposed Rule, airports can not 'inexpensively and quickly make such arrangements.' "Local fire departments"

do not routinely have spare ARFF vehicles. The nationwide availability of replacement ARFF vehicles is questionable and what are the assurances of the

replacement vehicles relative to Y2K?

We do believe it is prudent and we planned even prior to the issue to this proposed rule, to verify the operational status of our ARFF vehicles as well

as all critical systems on January 1, 2000 and we have no problem in

notifying the FAA of our status.

Sincerely,

Robert J. Burr, AAE
Deputy Director of Operations



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