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U.S. Department of Transportation
Docket No. FAA-1999-5833 - 5
400 Seventh Street S.W.
Room Plaza 401
Washington, D.C. 20590

To Whom It May Concern:

Thank you for the opportunity to comment on FAA's proposed amendments to its Licensing and Safety Requirements for the Operation of a Launch Site, 64 FR 343 16, published in the Federal Register of June 25, 1999.

The mission of the National Fire Protection Association (NFPA) is to reduce the worldwide burden of fire and other hazards on the quality of life by providing and advocating scientifically-based consensus codes and standards, research, training, and education.

We are pleased that FAA is requesting public comment on the use and applicability of one of our state-of-the-art standards, NFPA 780, ***Installation of Lightning Protection Systems***.

It is imperative that proper lightning protection be provided at launch sites. NFPA 780 provides for the practical safeguarding of people, buildings, special occupancies, heavy duty stacks, structures containing flammable

Publishers of the National Fire Codes® and National Electrical Code®

A non-profit membership organization dedicated to promoting safety from fire, electricity, and related hazards through research, codes and standards, technical advisory services, and public education since 1896.

U.S. Department of Transportation
Docket No. FAA-19994833
Page Two

liquids and gases, and other entities against lightning damage. NFPA 780 provides a lightning protection system that has withstood the test of time back to Benjamin Franklin's era.

NFPA encourages FAA to require the latest lightning protection methods and devices by adopting NFPA 780.

To address static electricity, NFPA recommends that the FAA include NFPA 77, **Static Electricity**, as a reference document to provide background information. A new edition will be released in May 2000 which will do an excellent job of reviewing the basics of static electricity and its hazards.

The NFPA staff would be glad to respond to any questions. Please feel free to contact me at 703-516-4346.

Sincerely,

A handwritten signature in cursive script that reads "Sara C. Yerkes".

Sara C. Yerkes
Director, Government Affairs

Cc: Anthony R. O'Neill, Vice President, Government Affairs
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