

RAA

also needs to be simplified. Blanket petitions are very useful since they eliminate the need for each air carrier to request the same exemption and they reduce the need for the FAA to process similar exemptions. We view blanket exemptions as distinct from rules since in granting relief for an individual air carrier, the FAA field offices must make a unique determination that the carrier can satisfy the conditions of the exemption before it is approved as an Operations Specification change.

RAA requests that the FAA endorse the concept of blanket exemptions and if different rules should apply to granting a "blanket" exemption, we request that you provide them.

1. Lastly, the proposed rules on requesting public meetings (FAR's 11.51 and 11.53) seem overly restrictive. For example, a public meeting may not be appropriate for security rules. Non-public discussions relating to sensitive security information would certainly be more beneficial to the public than having a public meeting where open discussions are limited by the nature of the material discussed. It is our understanding that the Administrative Procedures Act does not limit ex-parte discussions but that the government agency conducting such discussions should place in the public docket, general information that the meeting took place and what was discussed without detailing the sensitive information.

RAA requests that the rules of public meetings be amended to state that while public meetings are preferred, non-public meetings may also be conducted provided general information that the meeting took place is placed in the public docket.

Your consideration of the comments and requests of RAA and its member's, is appreciated.

Sincerely,

David Lotterer
Vice President, Technical Services

Attachment A