



NATIONAL AIR  
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May 13, 1999

Federal Aviation Administration  
Office of Chief Counsel  
Rules Docket Office [29547]  
800 Independence Avenue, SW  
Room 915-G  
Washington, DC 2059 1

**RE: DOCKET No. 29547: 207-MINUTE EXTENDED RANGE OPERATIONS WITH  
TWO-ENGINE AIRCRAFT (ETOPS) OPERATION APPROVAL CRITERIA**

The National Air Transportation Association (NATA) represents the interests of aviation businesses nationwide including on-demand air charter operators regulated under Part 135.

Many on-demand air charter operators routinely conduct flights in the North Pacific area of operations. While ETOPS does not currently apply to the Part 135 air charter industry, such requirements may apply in the future as the European Joint Aviation Authority (JAA) promulgates its regulations and as the Federal Aviation Administration (FAA) and JAA continue harmonization efforts.

After reviewing the proposed policy statement, NATA supports the expansion of the current 180-minute ETOPS. The Association believes that the data supports the expansion and that the policy contains sufficient additional requirements for operators wishing to utilize 207-minute ETOPS. Accordingly, NATA encourages the FAA to adopt the proposed policy in a timely manner.

Sincerely,

  
Andrew V. Cebula  
Vice President