

84074

# AMERICAN COLLEGE of CARDIOLOGY



OFFICE OF THE CHIEF COUNSEL  
RULES DOCKET  
2000 JUN -6 USA 3:47  
Health House  
1111 Old Georgetown Road  
Bethesda, MD 20814-1699

301-897-5400  
800-253-4636  
Fax: 301-897-9745  
<http://www.acc.org>

May 16, 2000

Dr. Jon Jordan  
Federal Air Surgeon  
Federal Aviation Administration  
Room 800 West  
800 Independence Avenue, SW  
Washington, DC 20591

FAA-2000-7119-13

- President**  
George A. Beller, MD
- President-Elect**  
Douglas P. Zipes, MD
- Immediate Past President**  
Arthur Garson, Jr, MD, MPH
- Vice President**  
W. Bruce Fye, MD, MA
- Secretary**  
James T. Dove, MD
- Treasurer**  
Michael J. Wolk, MD
- Chair, Board of Governors**  
James T. Dove, MD

Dear Dr. Jordan:

The American College of Cardiology (ACC) is a 24,000-member non-profit professional medical society and teaching institution whose purpose is to foster optimal cardiovascular care and disease prevention through professional education, promotion of research, and leadership in the development of standards and formulation of health care policy. The College represents more than 90 percent of the cardiologists practicing in the United States.

- Trustees**
- Joseph S. Alpert, MD
- Morton F. Arnsdorf, MD
- George A. Beller, MD
- Robert O. Bonow, MD
- Robert M. Califf, MD
- Melvin D. Cheitlin, MD
- Michael H. Crawford, MD
- Pamela S. Douglas, MD
- James T. Dove, MD
- Bernard W. D. Fong, MD
- W. Bruce Fye, MD, MA
- Arthur Garson, Jr, MD, MPH
- Raymond J. Gibbons, MD
- John W. Hirshfeld, Jr, MD
- Sharon A. Hunt, MD
- Spencer B. King, III, MD
- Costas T. Lambrew, MD
- Marian C. Limacher, MD
- Bruce D. Lindsay, MD, ex officio
- Ben D. McCallister, MD
- Joseph V. Messer, MD
- Steven E. Nissen, MD
- Richard L. Popp, MD
- Robert Roberts, MD
- George W. Vetrovec, MD
- L. Samuel Wann, MD, ex officio
- W. Douglas Weaver, MD
- William S. Weintraub, MD
- Michael J. Wolk, MD
- Douglas P. Zipes, MD

The College has been actively involved in the development of guidelines and policies regarding cardiovascular problems associated with aviation safety, including advocating for the placement of automated defibrillators on airplanes. In reviewing the minimum contents of first aid and medical kits currently required by the Federal Aviation Administration (FAA) for commercial air carriers, located at 14 C.F.R. 121.309, we noted that the dose of epinephrine required is not proper for the treatment of cardiac arrest. Appendix A to Part 121 requires that the medical kit contain "1 Epinephrine 1:1000, single dose ampule". Epinephrine 1:1000 is the proper dose for treatment of anaphylaxis, but not for treatment of cardiac arrest. Epinephrine 1:10,000 is the proper dose for the treatment of cardiac arrest.

The ACC urges the FAA to correct Appendix A to Part 121 to read "1 Epinephrine 1:1000, single dose ampule labeled 'for treatment of anaphylaxis' and 1 Epinephrine 1:10,000, single dose ampule labeled 'for treatment of cardiac arrest'". The current dose of epinephrine is not appropriate for use in cardiac arrest. Please contact Alan Yount, Assistant Director Regulatory and Legal Affairs, at 301-493-2352 or [ayount@acc.org](mailto:ayount@acc.org) if you should need further assistance on this important issue.

Sincerely,

George A. Beller, M.D., F.A.C.C.  
President

cc: Karl B. Kern, M.D., F.A.C.C.  
Christine McEntee  
Alan Yount