

Now is the time to address all of FAR 139. Cargo aircraft & chartered aircraft have a major impact at our airport but are not addressed in FAR 139. Wide bodied aircraft with several hundred people and similiar cargo aircraft frequent our facility but require no fire protection. Are we supposed to ignore them? Training requirements are also very weak in FAR 139. NFPA addresses these much better and the requirements were derived by industry experts. To address smaller airports only in this docket, appears to everyone in the ARFF community as band aid fix to a very old document which appears to need totally re-written. Much has changed since it's original inception and it is high time we look in to all aspects of airport certification pertaining to Aircraft Rescue & Fire Fighting.