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October 4, 2000

United States Department of Transportation Dockets
Docket Number FAA-00-7018 - 93
400 7th Street SW
Room Plaza 401
Washington, DC 20590

Re: Fees for FAA Services for Certain Flights

The National Business Aviation Association (NBAA) represents the interests of over 6,200 Member companies that utilize the flexibility provided by business aviation. NBAA defines business aviation as those businesses that derive less than half of their revenue from aviation products or services. NBAA Member companies account for over 8,400 aircraft and combined produce over 4.5 trillion dollars in revenue.

NBAA believes that the FAA did not recognize the incremental cost of business aviation to the U.S. ATC system by the use of weight as a factor in the fee formula. In addition to ICAO, countries such as Canada, the United Kingdom, France, Germany, and other European Union states, ATC facilities charge users for the service provided. In determining the ATC charge, all of these countries use weight as a basis for determining fees.

NBAA does not disagree with ICAO's position that the providers of international air navigation services may require users to pay their share of the costs. However, in order to properly recognize a "user's" share of the cost associated with air navigation services, aircraft weight must be added to properly recognize the incremented use this represents.

Business aviation contributes insignificantly to the overall ATC burden. Business aircraft prefer to stay away from the large airline-hub airports when possible, while seeking out smaller airports closer to the final destination. At hub airports, business aviation contributes on average less than six percent of the total traffic load. The FAA's ATC system evolved as a result of the air carrier hub-and-spoke operator and is not predicated upon the requirements of non-airline aircraft. Notwithstanding this domestic perspective, aircraft overflying the United States also contribute only incrementally to the total cost providing air traffic control services.

NBAA asks that the FAA modify its fee formula to account for aircraft weight as is done in other countries.

Sincerely,



Douglas Carr
Senior Manager, Government Affairs