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February 8, 2001

U.S. Department of Transportation Dockets
Docket No. FAA-2000-7479 - 275
400 Seventh Street, S.W.
Room Plaza 401
Washington, D.C. 20590

RE: Docket Number FAA-2000-7479

As President of the National Business Aviation Association (NBAA), I write to express NBAA membership concerns with the FAA proposal to further certificate airports, as contained in the above referenced docket. The proposal under consideration would revise the current airport certification regulation and would create regulatory requirements for airports serving scheduled air carrier operations in aircraft with 10 – 30 seats. The proposed regulation, if adopted, would be applicable to those facilities newly certificated as the result of this rulemaking.

NBAA's Manager of Airports/Ground Infrastructure, along with airport representatives, state aviation directors, regional airline representatives, fixed base operator representatives, FAA Airport Certification experts, and others participated on an Aviation Rulemaking Advisory Committee (ARAC) four years ago to thoroughly study this issue and to make recommendations about alternatives. This cross section of the aviation community invested many hours and days in establishing a majority committee recommendation, economically doable, that would have significantly enhanced safety at airports accommodating scheduled service by aircraft having 10 to 30 seats. The essence of the committee recommendation was to retain many elements of the 139 certification program that are cost-effective while significantly reducing the cost-prohibitive element of Airport Rescue and Fire Fighting (ARFF) requirement.

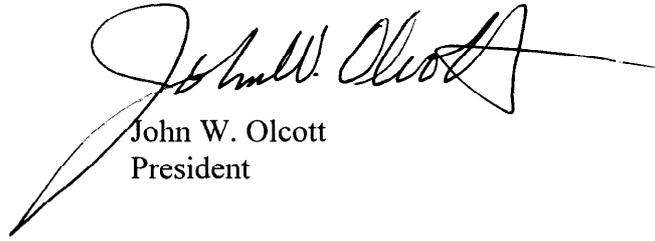
As others responding to this subject have pointed out, these smaller airports accommodating scheduled service from aircraft having 10 to 30 seats have limited financial resources and would be hard pressed to fund and maintain minimum FAA ARFF levels. Consequently, if this proposal were adopted, airports accommodating this service - not currently certificated by FAA - *would be required* to apply for a certificate under part 139 in order to serve certain air carrier operations. We are concerned that the significantly increased airport operating cost most likely will not be borne in total by the scheduled service providers, causing some airport operators to recoup both start-up and on-going operational cost of part 139 certification from general aviation/business aviation airport tenants and users. Secondly, those airports that determine that certification costs are unreachable, and opt out of the program, will be further disadvantaged by a loss of airline revenue, possible including essential air service.

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As a member of the General Aviation Coalition and partner with FAA on matters of concern to the general aviation community, I must affirm that we are less than satisfied that FAA did not fully consider the recommendations of the ARAC working group; and that the industry is now grappling with the costly regulatory posture posed by this rulemaking.

Thank you for your consideration of our position and concerns. If I can answer any questions or provide clarification on any points raised, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Olcott". The signature is written in a cursive style with a long horizontal stroke extending to the right.

John W. Olcott
President