

January 7, 2002

Docket Management System
U.S. Department of Transportation
Room Plaza 401, 400 Seventh Street, SW
Washington, DC 20590

Docket Number FAA-2001-10999

Dear Sir:

Yampa Valley Regional Airport (HDN), located in Northwest Colorado, has commercial service on a year-round basis and is the destination airport for the Steamboat Springs Ski Resort. During the winter months several jet carriers offer non-stop service between Yampa Valley Regional and major hubs such as Chicago, Dallas Fort Worth, Denver, Houston, Minneapolis and Newark. Consequently, the airport, the fixed base operator and the airlines hire several additional seasonal employees for snow removal, janitorial maintenance and aircraft ground handling. When the jet season is over these employees are laid-off until the next winter ski season. Our comments about the above docket number are as follows.

1. The 14 CFR Parts 107 and 108 Criminal History Records Checks; Final Rule does not address if seasonal employees must be fingerprinted each year in order to receive a SIDA badge. The Final Rule should establish a time limit that seasonal employees can be unemployed at the airport and receive a SIDA badge when they return the next season without getting another fingerprint criminal records check. Perhaps only a local employment records check or local criminal records check would be necessary for those employees that return to the airport each ski season to account for the period of time that they were not at the airport. Requiring fingerprint criminal records checks each time a seasonal employee leaves airport employment and returns would place a burden on the local airport operator from an operational and financial standpoint. Operationally because of the lead-time it takes to get the records check and financially because of the number of checks that would be required each year (approximately 200).

Thank you for your consideration of these comments.

Sincerely,

James C. Parker, Jr., A.A.E.
Aviation Director