



1635 Prince Street, Alexandria, Virginia 22314-2818 Telephone: (703) 683-4646 Fax: (703) 683-4745

---

April 16, 2002

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

ATTN: Docket TSA-2002-11604

Re: *TSA-2002-11604: Comments of Helicopter Association International in Support of  
National Air Transportation Association*

Dear Under Secretary Magaw:

Helicopter Association International (HAI) submits this comment in support of the comments submitted to this docket by the National Air Transportation Association (NATA) on April 22, 2002.

HAI is the professional trade association for the civil helicopter industry. Our 1,500-plus member organizations and 1,400-plus individual members safely operate more than 5,000 helicopters approximately 2 million hours each year. HAI is dedicated to the promotion of the helicopter as a safe, effective method of commerce and to the advancement of the civil helicopter industry.

HAI fully supports all of the points made by NATA in its thorough and well documented comments. In particular, we share NATA's observation that applicability of the new rule should be consistent with existing FAA standards concerning aircraft weight. We endorse NATA's recommendations to revise or otherwise clarify the applicability provision of 49 CFR § 1544.1 by amending the weight limitation to read ". . . aircraft with a minimum certificated takeoff weight of more than 12,500 pounds. . . ."

HAI also supports the recommendation made by Columbia Helicopters in its comment of March 21, 2002, that the applicability date of the new rules should be extended to September 11, 2003, to permit the development and distribution of adequate compliance guidance to industry.

Sincerely,

Joseph Corrao  
VP Regulations & International Affairs