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02 JUN 12 11:19:44
FEDERAL AVIATION ADMINISTRATION

May 29, 2002

Federal Aviation Administration
Drug Abatement Div AAM-800
800 Independence Avenue SW
Washington, DC 20591

RE: Proposed Rule Making Comments

To Whom It May Concern:

I wanted to take a moment and discuss my opinion on the proposed rule making for the rewrite for Part 121.

On the subject of requiring pre-employment testing before hiring or if more than 60 days have elapsed between pre-employment testing and safety-sensitive job performance:

RESPONSE: I feel the aviation industry has been so used to bringing someone back for rehiring without a pre-employment test for so long it will be very difficult to retrain so many companies on this drastic change. I am aware that some clients re-test anyway when an employee returns, but I also know that a lot do not. Getting these companies to now shift their thinking to test everyone is going to be difficult and very cost prohibitive. I would hope that if this change goes into effect that there is a long grace period for companies to relearn, and budget, how they do hiring.

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On the subject of periodic testing:

RESPONSE: I am very glad to see periodic testing eliminated. This has always been hard to track and get companies to follow. It is nice to see that the regulations will be not requiring this extra test any longer. It was a financial burden to all employers.

On the subject of plan approvals:

Answer: I was sorry to see consortium approvals revoked in the last rewrite. I still think working with aviation is a specialized niche. We are finding that someone (clincs or consortiums) with no experience in the airline industry is not doing their clients any benefits by lumping them in with their other transportation clients. We are hearing of errors by clinics or consortiums unfamiliar with the rules for FAA. That said, eliminating FAA approval will speed up a clients time to begin operations, however, it will in no way guarantee that they will be running their program correctly.

I would like to see that a company could begin operations within a week or two of starting a drug and alcohol testing program. We hear many complaints from clients who sign up and need to begin operations immediately. They are very disappointed to hear that the time from submission to approval can be as long as 8 weeks. For a scenic operator this could mean the loss of numerous air show slots for a season. For contractors they could lose a large contract with a major carrier and possibly future business.

I read that companies with operations specifications will be able to provide less information and be up and running quicker. I hope that consortiums will be allowed to assist companies in their operations specifications updates for drug and alcohol programs. We would like to assist our clients in any way possible to get them up and running as fast as we can.

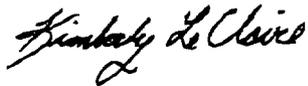
For companies that do not have operations specifications I hope that the applications can be streamlined so that the turnaround time is minimal from application to start-up. I would like to see "approval" time eliminated and start-up being immediately, but I know that is probably not realistic. If there was a way that we could make "approval time" faster we would be willing to work with the FAA in any way possible.

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Those are my concerns as a consortium which works with airline clients. We have been servicing the airline industry since 1989 and would like to continue working with airlines to keep them operating in the most efficient manner possible.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact our office.

Sincerely,



Kimberly LeClaire
Executive Program Manager