



Regional Airline Association
2025 M Street, NW
Suite 800
Washington, DC 20036-3309

Phone: (202) 367-1252
Fax: (202) 367-2252
Email: david_lotterer@dc.sba.com

January 20, 2003

Docket Management System
U.S. Department of Transportation
Docket number FAA-2002-14002
Room Plaza 401, 400 Seventh Street, SW.
Washington, DC 20590-0001.

SUBJECT: Proposed Rule: Area Navigation (RNAV) and Miscellaneous Amendments

The Regional Airline Association (RAA) submits the following comments on behalf of our membership (Attachment A).

RAA requests that the comment period be extended for 90 days. We need additional time in order to adequately respond to the docket

We have found the proposed rule to be very complex and involve many issues with ramifications affecting crewmember training and aircraft equipage requirements. Additionally, the proposal may impose significant navigation equipment requirements to NAS users. The NAS users must have sufficient time to assess the potential financial considerations.

Finally the events of 9/11/2001 and subsequent economic down-turn in our industry have significantly altered industry fleet sizes. This was not reflected in the latest (April 2002) document. Since your analysis is projecting what the fleet will look like 20 years into the future, we believe it is significant that your future fleet projection be based upon current fleet sizes. RAA will provide current data for the regional fleet.

Granting the industry additional time to respond will add greatly to understanding the issues and forecasts that serve to support the proposal.

Your consideration of our request is greatly appreciated.

Sincerely,

David Lotterer
Vice President - Technical Services

Attachment A



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Company	City, State
Aeromar *	Mexico City, DF
Air Canada Jazz*	Enfield, Nova Scotia, Canada
AirNet Systems	Columbus, OH
Air Serv	Redlands, CA
Air Wisconsin	Appleton, WI
Allegheny	Middletown, PA
American Eagle	Dallas, TX
Atlantic Coast Airlines	Dulles, VA
Atlantic Southeast (ASA)	Atlanta, GA
Big Sky Airlines	Billings, MT
Boston-Maine Airways	Portsmouth, NH
Cape Air	Hyannis, MA
Chautauqua Airlines	Indianapolis, IN
Chicago Express	Chicago, IL
Colgan Air	Manassas, VA
Comair	Cincinnati, OH
CommutAir	Plattsburgh, NY
Continental Express	Houston, TX
Corporate Air	Billings, MT
Corporate Airlines	Smyrna, TN
Empire Airlines	Coeur d'Alene, ID
ERA Aviation	Anchorage, AS
Executive Airlines	Farmingdale, NY
Express Airlines I	Memphis, TN
Federal Express	Memphis, TN
Grand Canyon	Grand Canyon, AZ
Great Lakes Aviation	Bloomington, MN
Great Plains Airlines	Columbia, MO
Gulfstream Int'l	Miami Springs, FL
Horizon Air	Seattle, WA
IBC Airways	Miami, FL
Island (Aloha) Air	Honolulu, HI
Mesaba	Minneapolis, MN
Midway Airlines	RDU Int'l Airport, NC
New England Airlines	Westerly, RI
North-South Airways	Atlanta, GA
Pace Airlines	Winston-Salem, NC
Piedmont Airlines	Salisbury, MD
PSA Airlines	Vandalia, OH
Scenic Airlines	N. Las Vegas, NV
Seaborne Airlines	US Virgin Islands
Shuttle America	Windsor Locks, CT
Skyway Airlines	Oak Creek WI



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