



AIR TRANSPORT ASSOCIATION

**DRAFT**

May 14, 2003

Docket Management System  
US Department of Transportation  
Room - Plaza 401  
400 – Seventh Street, SW  
Washington, DC 20591

Re: Notice of proposed rulemaking (NPRM), Docket No. FAA 2003-15085;  
Notice No. 03-08, Hazardous Materials Training Requirements

Dear Sir or Madam:

I write on behalf of the members of the Air Transport Association of America, Inc. (ATA)<sup>1</sup> to request an extension of the comment period in response to the Notice of Proposed Rulemaking (NPRM) in Docket No. FAA 2003-15085; Notice No. 03-08, Hazardous Materials Training Requirements.

The NPRM, published in the *Federal Register*, May 8, 2003 (Volume 68, Number 89), proposes amendment to 14 CFR Parts 119, 121, 135, and 145. Comments on the NPRM must be received on or before July 7, 2003.

Although on its face, the NPRM appears straightforward and relatively uncomplicated, the rule contains very substantial and broad changes to the hazardous materials regulatory requirements. It does, in fact, raise significant operational and systems management issues that relate to a number of different departments within each airline. The NPRM requires more time to analyze, consider and coordinate within each airline and within the industry than the 60 days allowed for comment. As the pointed out in the summary, the FAA originally promulgated hazardous materials training requirements over 25 years ago and the aviation industry can not be expected to respond within a 60 day period.

In order to better appreciate these broad and substantive changes and the effects on the airline industry, ATA, on the behalf of its members, is requesting an additional 60 days in which to comment to the rule.

<sup>1</sup>ATA's members are: Airborne Express, Alaska Airlines, Aloha Airlines, America West Airlines, American Airlines, American Trans Air, Atlas Air, Continental Airlines, Delta Air Lines, DHL Airways, Emery Worldwide, Evergreen International, Federal Express, Hawaiian Airlines, JetBlue, Midwest Express, Northwest Airlines, Polar Air Cargo, Southwest Airlines, United Airlines, United Parcel Service, and US Airways. ATA's associate members are Aeromexico, Air Canada, Air Jamaica, KLM--Royal Dutch Airlines, and Mexicana Airlines.

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For these reasons, the ATA requests the FAA to extend the comment period in this matter from July 7, 2003 until September 5, 2003, in order to develop a considered response.

We ask for the understanding of the Agency and your immediate consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'F. Black', with a long horizontal flourish extending to the right.

Frank J. Black  
Director, Cargo Services & Secretary,  
Dangerous Goods Board

Cc: William Wilkening, Program Manager, Hazardous Materials Division, FAA  
James Casey, Vice President & Deputy General Counsel, ATA  
Nestor Pylypec, Vice President Industry Services, ATA  
Donald Collier, Vice President Engineering, Maintenance & Materiel  
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David Lotterer, Vice President, Technical Services, Regional Airline Association (RAA)  
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Ron Priddy, President, National Air Carrier Association