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Re: Docket No. FAA-2003-15085; Notice No. 03-08; Hazardous Materials Training Requirements; Request for Extension

Dear Sirs:

The Conference on Safe Transportation of Hazardous Articles ("COSTHA") hereby requests an additional 60 days to respond to the Notice of Proposed Rulemaking published in this proceeding. 68 *Federal Register* 24810 (May 8, 2003).

COSTHA is a not-for-profit organization representing manufacturers, shippers, distributors, carriers, freight forwarders, trainers, packing manufacturers and others associated with the hazardous materials transportation industry. In addition to promoting regulatory compliance and safety in hazardous materials transportation, COSTHA also provides training services and support for its member companies in complying with the requirements for transporting hazardous materials by all modes, including air.

In addition, COSTHA has a number of member companies that themselves provide training services for shippers, carriers and others involved in the transportation of hazardous materials by air and other modes. Since many COSTHA members are directly involved with the offering for transport and transport of a wide variety of hazardous materials by aircraft, COSTHA has a direct interest in this rulemaking.

COSTHA agrees with extension requests filed by the Air Transport Association of America and the National Air Transportation Association that there is good cause for granting this extension of time in which to file comments. The proposed rule would substantially expand the scope of hazmat training required for personnel at repair stations, "will not carry" operators, and persons who supervise the performance of a Transportation Related Function ("TRF").

Furthermore, the proposed rule would impose new hazmat training requirements for approximately 3,000 on-demand charter carriers that operate some 6,411 aircraft under 14 CFR Part 135. *2003 Fact Book*, National Business Aircraft Association, November 2002.

Due to the breadth of this proposed rulemaking, the regulated industry and the hazmat training companies need additional time to digest the implications of the proposal in order to make appropriate and insightful comments to the docket. Moreover, there is no urgent need to complete this rulemaking in an expedited time frame. In fact, the Senate Committee on Commerce, Science and Transportation last week reported favorably a bill that would require the Department of Transportation to submit a study on the costs and benefits of expanding hazmat training requirements to "will not carry" operators, one of the proposals under consideration.

For these reasons, COSTHA requests an additional 60 days in which to file comments in this proceeding.

Respectfully submitted,



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