

As an owner of an FBO that operates an FAR 145 repair station and also an Air Carrier Certificate (FAR Part 135), I am opposed to the several of the changes outlined in the NPRM. From an Air Carrier perspective, we do not carry Hazmat and conduct initial and annual recurrent recognition training. For over 20 years, this training has proven to be sufficient for on-demand charter operations that deal primarily in passenger transportation. We have adhered to the Hazmat disclaimer posting at our facility and have used the DOT Hazmat handouts for our passengers. We don't fly cargo (except baggage that is presented by passengers). I don't believe that the additional training requirements that will be imposed on on-demand Air Carriers will enhance safety. From the FBO's perspective, I believe that the rule needs to be more narrow in its focus - namely, those involved in presenting Hazmat for shipment should be trained. That training needs to be very specific as to what is Hazmat and what precautions that must be taken for shipment of these items. However, the cargo Air Carriers are doing an excellent job in screening packages that are presented for shipment. They have very detailed labeling requirements.

I am always concerned when I see a very "broad" regulation such as this. It leaves the door wide open to enforcement action by having almost everyone in the chain of shipment accountable. This regulation needs to be reduced in its applicability and eliminate additional training for the on-demand Air Carriers. The cost/benefit is not justified.