

AmAv, Inc.

BOX 29 MARTIN STATE AIRPORT • 701 WILSON POINT ROAD
BALTIMORE, MD 21220
PHONE: 410-391-1738 • FAX: 410-687-9368

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Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh St. SW
Washington DC 20591

Docket No. FAA-2003-15085

TO WHOM IT MAY CONCERN:

AmAv, Inc. is a small Part 135 air carrier with fewer than 20 employees. We provide transportation of persons in turbo-prop and jet aircraft. We do not carry hazardous materials, and we rarely carry cargo only. We currently train all crews under FAR 135.333 as required to recognize, and therefore refuse to carry, hazardous materials.

As a "will-not-carry certificate holder" we believe that the proposed training and record keeping requirements under the proposed regulations will impose a significant burden on us, both in dollars and in time, and that there will be no appreciable increase in safety since we already train to the standards listed in the proposed regulation. The economic analysis of the impact on small operators is incorrect in our view.

The proposed rule would require extensive changes to our Operations Manual, as well as the development and FAA approval of the newly mandated training program. Our local FAA office, the Baltimore FSDO, is already overburdened and under-staffed and unable to meet their current job requirements in a timely fashion. Adding another training program for them to approve is a substantial increase in their job requirements. What is the recourse for a company like mine if I submit a training program but my POI is unable to "get to it" and approve it within the 15 month time frame?? Will we be grounded because we do not have an approved program through no fault of our own? This issue of this additional burden to the FAA is not addressed in the economic impact section of the NPRM.

Sincerely,

Jane M. Toskes
President