

Menlo Worldwide Forwarding
One Lagoon Drive
Redwood City, Ca. 94065

August 29, 2003
Docket Management System
United States Department of Transportation
Room Plaza 401
400 Seventh Street
Washington, D.C. 20591

Ref: Docket FAA-2003-15085

We appreciate the opportunity to comment on Docket Number FAA- 2003-15085 and your intent to improve the training and safety in the movement of hazardous materials in the air transportation community.

It is our opinion that the provisions for workers that provide or supervise a Transport-related function (TRF) for more than one certificate holder in proposed 121.03 (c) and 135.503(c) do not adequately address our needs as an integrated freight forwarder.

Company Background

Menlo Worldwide Forwarding (formerly Emery Worldwide) currently administers an all air cargo system with over eighty (80) domestic and international flight segments on a daily basis.

Menlo Worldwide Forwarding (MWF) is not a certificate air carrier.

MWF contracts with air carriers to operate all flights.

MWF employees currently provide transport-related functions including hazardous material acceptance, handling, cargo loading, load planning, pilot notification, and aircraft loading on behalf of contracted air carriers.

Ground services contactors under the supervision of MWF are used to provide load planning, aircraft loading, and pilot notification.

Current Training

MWF has developed an I.A.T.A.- endorsed hazardous material employee-training program that provides training in all areas as identified in Table 1.

We have also developed and provide training materials for contracted ground service providers. We have a program in place to provide oversight on the training program to ensure current training and performance of the contracted ground service providers.

Recommendation

Menlo Worldwide Forwarding recommends that an additional exception be included in the proposed rule to allow the establishment of a stand-alone training and supervision program administered by any integrated freight forwarder that contracts multiple certificate holders to transport dangerous goods.

The training program would be based on hazardous material policies established by 49CFR 171.11, I.C.A.O. Technical Instructions, and the consolidated policies of the contracted air carriers.

The training program and services provided by the company would certainly be subject to review and approval of the F.A.A.

Air Carriers would incorporate the training regimen into their approved program by referring to the integrated freight forwarder's training program and services in their Operations Manuals.

Respectfully submitted,

Dennis Martin

Director of Dangerous Goods
Menlo Worldwide Forwarding