



December 9, 2003

Docket Management Facility  
U.S. Department of Transportation  
400 Seventh Street, SW  
Room PL-401  
Washington, DC 20590

Re: Docket FAA-2002-6717, Request for  
Extension of Time to Comment

**CARGO AIRLINE ASSOCIATION**

Gentlemen:

The Cargo Airline Association (hereinafter “the Association”) hereby requests an extension of 90 days, until April 13, 2004, to file Comments in the above-cited Docket. In support of this request, the Association states as follows:

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By publication in the November 14, 2003, edition of the *Federal Register*, the Federal Aviation Administration has proposed an entirely new regulatory structure for Extended Range Operations. If finally adopted, for the first time aircraft with more than two engines would be covered by requirements that have previously been applicable only to two engine equipment. These proposed regulations would fundamentally change the regulatory requirements applicable to all extended range operations and would impose significant new burdens on many members of the all-cargo industry. Therefore, members of the industry have a significant stake in the outcome of this rulemaking and need sufficient time to analyze and respond to the proposals. The current due date for such responses, January 13, 2004, does not afford the time necessary for such an adequate response.

The proposed rules were developed through the ARAC process that consumed over three years. The proposed rules themselves (along with the required Regulatory Analysis) are hundreds of pages long and contain both policy and cost/benefit analyses that require extensive review. Moreover, this review must take place at a time of the year (the holiday season) when all-cargo industry members responsible for the review are otherwise consumed with operational issues related to the delivery of holiday packages and therefore cannot devote full time to regulatory issues raised. In view of the fact that the NPRM identifies no urgent safety issues that must be addressed in the very short term, such a 90 day extension would in no way compromise safety and would necessarily lead to a more robust and useful record on which the FAA can make its final determinations.



Wherefore, the Association respectfully requests that the due date for comments in Docket FAA-2002-6717 be extended until April 13, 2004. In addition, we respectfully urge that a ruling on this request be made no later than December 24, 2003, to permit adequate planning for the filing of comments. Thank you very much for your consideration.

Sincerely yours,

Stephen A. Alterman  
President

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