AIR TRANSPORT ASSOCIATION

December 20, 2003

Docket Management System
U.S Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590-0001

Re: **Extended Operations of Multi-engine Airplanes (ETOPS)**
Notice of Proposed Rulemaking
Docket No. FAA-2002-6717
68 Fed. Reg. 64730 (November 14, 2003)

REQUEST FOR EXTENSION OF COMMENT PERIOD: APRIL 13, 2004

Dear Sir or Madam:

The Air Transport Association of America, Inc ("ATA"), on behalf of its member airlines,[1] respectfully files this request for a ninety (90) day extension of the comment period on the **Notice of Proposed Rulemaking** ("NPRM") concerning new, significantly expanded regulatory requirements for aircraft with more than two engines operating on extended operations, Docket No. FAA-2002-6717. In addition, ATA requests sufficient time to comment on the related **Draft Regulatory Impact Statement** docketed on December 3, 2003, the **OMB Recommendations to FAA/DOT** docketed on December 15, 2003, and the anticipated **related guidance materials** not yet available for review.

As noted in the NPRM, the proposed regulatory scheme follows a three-year effort by the ARAC ETOPS Working Group involving many complex operational and technical issues. The NPRM, however, provides a sixty (60) day comment period that, in view of the extensive scope and significant impact of the issues it presents, is insufficient to

[1] The members of the Association are: Airborne Express, Alaska Airlines, Aloha Airlines, American West Airlines, American Airlines, Astar Air Cargo (formerly DHL Airways), ATA Airlines (formerly American Trans Air), Atlas Air, Continental Airlines, Delta Air Lines, Menlo Worldwide Forwarding, Evergreen International Airlines, Federal Express Corp., Hawaiian Airlines, jetBlue Airways, Midwest Airlines, Northwest Airlines, Polar Air Cargo, Southwest Airlines, United Airlines, United Parcel Service, and US Airways; associate members are: Aerovías de México, Air Canada, Air Jamaica, KLM-Royal Dutch Airlines, and Mexicana de Aviación.

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permit meaningful review and development of substantive comments. We, therefore, request an extension until April 13, 2004, to submit written comments on the NPRM, lengthy DRAFT Regulatory Impact Statement, OMB Recommendations, and related guidance materials (assuming these materials are available in the near future).

This extension will ensure those most directly impacted by the NPRM, ATA's member airlines, have the ability to review its numerous provisions thoroughly and analyze their impact. Moreover, it will permit the airlines – affected to varying degrees by the proposal -- to respond to FAA's request for substantive comments, including requests for supporting data on the potential economic and operational impacts of several specific provisions on which FAA had limited or no data. Based on our preliminary review of the NPRM and Draft Regulatory Impact Statement, we believe there are a number of provisions on which ATA and its members will submit detailed analyses and comments relating to compliance issues, clarification, implementation costs, and reasonableness.

ATA appreciates FAA's consideration of this request and respectfully urges FAA to act on this request as soon as possible. Please contact me regarding any questions or concerns.

Sincerely,

AIR TRANSPORT ASSOCIATION OF AMERICA, INC.

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cc: Mr. Nicholas Sabatini, FAA, AVR-1
Mr. James Ballough, FAA, AFS-1
Mr. John Hickey, FAA, AIR-1
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