

Elimination of Distributors from being able to handle or repackage Chemical Oxygen Generators to the Aircraft Industry should be eliminated from the referenced docket. There are only three manufacturers in the world of these units and the primary manufacturer (Draeger Aerospace) is located in Lubek, Germany. Being qualified on all large aircraft, they have appointed three authorized distributors to insure the industry has adequate supply of product to meet airline requirements any place in the world.

Repackaging of large shipments from Germany to meet customer requirements in North and South America is the responsibility of the US distributor. The distributor is required to maintain a shipset of each generator in stock for emergency decompressions or ship small quantities to meet airline requirements for repairs and maintenance. Several times airlines have had to use the certified hazardous personnel of the distributor to repackage chemical generators for movement within their own system for lack of certified personnel. To meet Aircraft on the Ground (AOG) requirements mandates that qualified product be available within hours which is near impossible should the source be only available in Germany. The same holds true for US manufacturers having to support fleets in Europe, Far East and Middle East.

It is our opinion that having certified personnel employed by authorized distributors of the few manufacturers for repackaging and shipping in accordance with regulations should be permitted. To eliminate this function of the airline industry will greatly hinder product required on aircraft from being available in times of need. Being named as an AUTHORIZED distributor by the manufacturer and meeting certified shipping requirements should eliminate most of the 180 holders mentioned in the docket. Aviosupport is the exclusive distributor for North and South America of Draeger Aerospace and employees three holders qualified the repackage and ship the Chemical Generators.

The authorized distributor should only be allowed to repackage in conformity with shipping regulations using qualified packaging material with documentation prepared by only certified personnel.

We believe there to be no more than 10 authorized distributors in the entire world by all three manufacturers which should not be overly burdensome to control since the distributor would have to be authorized by the manufacturer and certified by Federal Regulators. Only the authorized distributor or manufacturer could repackage the generators, not repackagers, or resellers.