

294193



AV-EX

AVIATION EXCELLENCE
A SUBSIDIARY OF RADOMES, INC.

DAO
8/19/04

8700 King George
Suite 100
Dallas, Texas 75235-2213

Phone: (214) 267-0800
Sales & Customer Service Fax: (214) 267-0888
Exec. & Finance Fax: (214) 267-0880

www.av-ex.com

e mail: sales@av-ex.com

Wednesday, July 21, 2004

Robert A. McGuire
Department of Transportation
USA

Mr. McGuire:

RSPA-2004-17664-15

We are an aircraft parts distributor with Competent Authority to ship Oxygen generators.(UN3356)

I have read the proposed changes for transportation of chemical oxygen generators. These proposed changes will effectively takes us out of the "Oxygen generator" business. The cost for packaging, the inability to ship by air and the necessity of transporting shipping containers back to manufacture, leave no room for a distributor to deal with these parts.

The only proposed change that would allow us to continue as a distributor is "Ground Only"
This would allow companies other than the manufacture to have a fair shot at providing service.

I am confused as to why this has become a critical issue. The only accident/incident that I can recall happened to ValueJet many years ago. In this case the problem was improper marking and loading, not packaging standards.

I think you need to address the question, why is there fire in the cargo bay, not what effect the fire has on oxygen generators. Many non hazmat materials, such as rubber and plastics, when exposed to fire will give off deadly gases and thick smoke. The thick smoke is probably what brought down ValueJet.

Sincerely,

Dan Lamb
Quality Control Manager

10/21/04 10:50 AM
10/21/04 10:50 AM