



Mr. Kendall Ball
Airport Improvement Program Branch
APP-520
Airports Financial Assistance Division
Room 619
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington DC 20591

September 2, 2004

Re: Docket No. FAA-2004-18925, Notice of modification of Airport Improvement Program grant assurances and of the opportunity to Comment

Dear Mr. Ball:

The American Association of Airport Executives formally requests an extension of the comment period in Docket No. FAA-2004-18925: Notice of modification of Airport Improvement Program grant assurances and of the opportunity to comment. The notice instituting this proceeding appeared in the August 24, 2004 edition of the Federal Register and directed that comments be filed within 30 days from the date of publication. We ask that the FAA extend the comment period for an additional 60 days. We are aware that Airports Council International-North America has also asked for an extension and we would like to do so too, for similar reasons.

This is a highly significant rulemaking for our members. The FAA rarely provides the opportunity to comment on AIP program grant assurances, and has never in recent memory proposed to reorganize them to the extent proposed in the August 24 notice. We are very pleased to see that the agency had responded to the concerns of both of our organizations and we would like to comment extensively on the reworked grant assurances proposed by FAA. As noted in the request submitted by ACI-NA, this is a unique opportunity to comment on statutory changes that may be needed to affect the kind of changes we have often advocated.

Both the substance and wording of the AIP grant assurances are critical to airports. Most of our member airports are subject to the existing set of grant assurances, and are expected to apply for grants which will be subject to any modified set of assurances. AIP grant assurances are highly significant from the perspective of airport operators, due to the nature of the obligations they dictate and because of the potential consequences if the FAA is presented with complaints about alleged airport non-compliance. Thirty days does not give the airport community sufficient time to draft comments which would provide meaningful input to the FAA's modification of the grant assurances.

If the due date for comments is extended, this will give both our staff and our members an opportunity to discuss this proceeding and be in a position to offer the agency more informed responses to the issues raised by the August 24 notice.

We therefore respectfully request that the comment period be extended until Monday, November 22, 2004.

Sincerely,

Margaret T. Smith
Director of Regulatory Affairs
American Association of Airport Executives