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February 11, 2003

via email and electronic submission

Mr. Kevin Willis
Airport Safety Certification Specialist
Federal Aviation Administration
Room 619
800 Independence Avenue, S.W.
Washington, DC 20591

Re: FAA Docket FAA-2003-14246
Airport Privatization Pilot Program
Notice of receipt of application –
New Orleans Lakefront Airport
New Orleans, Louisiana

Dear Mr. Willis:

The Board of Commissioners of the Orleans Levee District ("OLD") and American Airports Lakefront, LLC ("AAL") respectfully oppose the request of the Aircraft Owners and Pilots Association ("AOPA") to double the comment period on the pending privatization application from 60 to 120 days. The proposed application will produce the important benefits envisioned by Congress when it enacted the privatization statute -- bringing new capital and creative management to bear on modernizing, maintaining and enhancing a public airport.

The issues inherent in our joint application have been the subject of numerous meetings between OLD and the public, AAL and the public, OLD and/or AAL and the users of the airport and OLD and/or AAL with various community groups. The public, including AOPA members, have had access to relevant information for many months.

All of the salient factors bearing on the FAA's decision have been set forth and thoroughly vetted in the application and responses to FAA staff questions. AOPA has not stated with any specificity what "research" it might need to perform that would

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warrant a 60 day extension of the comment period. Furthermore, AOPA, as the nation's primary general aviation lobbying group, is well versed in the details of the privatization statute and its requirements.

The FAA published the Notice in the Federal Register on January 16, 2003. On January 21, 2003, the FAA submitted the last supplemental documentation to the DMS record. OLD and AAL would not oppose a modest 5 day extension of time to afford AOPA the full 60 day period to comment on all relevant documents. However, in the absence of specific, detailed information gathering requirements and a showing of good cause, the FAA should not grant a major unconditional extension of the comment period.

OLD and AAL stand ready to assist AOPA in efforts to understand the documents that define our privatization application. We offer such additional outreach to help insure timely comments by AOPA. OLD and AAL are available to go to AOPA's offices and discuss any questions that are not already answered on the record. While we believe that the record is already replete with the information required by the statutes and the FAA's policies, the parties are willing to provide such information needed by FAA to respond to those criteria. OLD has appreciated the support of AOPA members in the past, and AAL is very excited about the prospects of serving AOPA members at Lakefront Airport in the future.

Sincerely,

J. E. Murdock III
Alexander Van der Bellen
Counsel for the Joint Applicants

cc: AOPA (reciprocal courtesy of serving future copies requested)