



May 12, 2009

The Honorable John D. Rockefeller
Chairman
Senate Committee on Commerce,
Science, and Transportation
254 Russell Senate Office Building
Washington, DC 20510

The Honorable Kay Bailey Hutchison
Ranking Member
Senate Committee on Commerce,
Science, and Transportation
560 Dirksen Senate Office Building
Washington, DC 20510

Dear Chairman Rockefeller and Ranking Member Hutchison:

We are writing to urge you to oppose any and all attempts to include language in the Senate version of the Federal Aviation Administration (FAA) Reauthorization bill that would either legislate changes in the current aircraft rescue and fire fighting (ARFF) standards or legislate that an unfair rulemaking process be undertaken to make changes in the standards. If enacted into law, these proposals could unnecessarily increase costs for airports and airlines as well as jeopardize commercial air service to small communities.

As you may know, H.R. 915, the FAA Reauthorization Act that the House Transportation and Infrastructure Committee approved earlier this year, contains a provision that could force airports of all sizes to comply with controversial National Fire Protection Association (NFPA) standards. Although each of us supports various sections in the House bill, we are unified in our opposition to Sec. 311, in part, because it could impose huge costs onto airports and the airlines without any benefit to aviation safety.

The Honorable John D. Rockefeller
The Honorable Kay Bailey Hutchison
May 12, 2009
Page 2

To meet NFPA standards, airports of all sizes would be required to dramatically increase the number of fire fighters and add additional facilities without any evidence that these changes would improve the safety of airports. Increased capital and annual operating costs resulting from the NFPA standards would force airports to divert their already limited funding resources from other necessary safety and airport improvement projects. For communities that rely on Essential Air Service, adopting NFPA standards without careful evaluation could further damage a program that is already under stress. These increased costs would be passed on to the traveling public at a time when many can least afford it.

A survey of 55 airports conducted by Airports Council International – North America (ACI-NA) in October found that the capital costs to comply with the NFPA standards would range between several thousand dollars and \$33 million, with the average cost of compliance being \$6.5 million. The responding airports also reported that the NFPA standards would increase their annual operating costs by between \$25,000 and \$10 million, with the average cost of compliance being \$2.5 million per year.

The American Association of Airport Executives (AAAE) has also been compiling information from airports around the country about the cost to comply with NFPA standards. Based on feedback the association has received from approximately 50 large, medium, small and non-hub airports, AAAE expects that the increased operating requirements could cost the airport industry as much as \$1 billion per year and \$4 billion in increased infrastructure and equipment costs.

Updates to the FAA ARFF standards have been evaluated by the Aviation Rulemaking Advisory Committee (ARAC), which allows *all* interested stakeholders, including airlines, pilot organizations, airports, the FAA and fire fighters to participate, and the final report is being sent to FAA. In addition, a study conducted under the well-respected Airport Cooperative Research Program (ACRP) on how proposed ARFF standards would impact airports will be released this summer. The FAA needs time to properly evaluate the information put forth by both the ARAC and the ACRP study to determine what, if any, changes are needed to the ARFF standards.

Please reject any efforts to include any language in the Senate version of the FAA Reauthorization bill that would either legislate changes to the current ARFF standards or legislate that an unfair rulemaking process be undertaken to make changes in the standards. Instead, we urge you to allow the FAA to continue to work with aviation stakeholders as the ARAC process comes to a close and carefully review the ACRP report data.

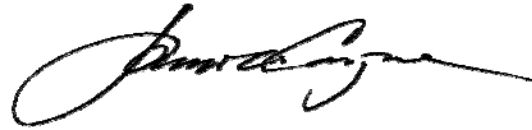
The Honorable John D. Rockefeller
The Honorable Kay Bailey Hutchison
May 12, 2009
Page 3

Thank you for your leadership on aviation issues. We look forward to continuing our working relationship to ensure that our nation's aviation system remains safe and secure.

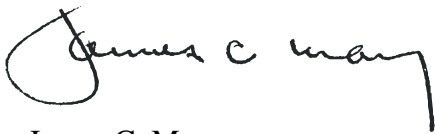
Sincerely,



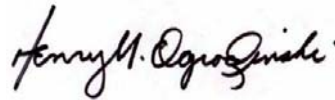
Greg Principato
President
Airports Council International-North America



James C. Coyne
President
National Air Transport Association



James C. May
President and CEO
Air Transport Association



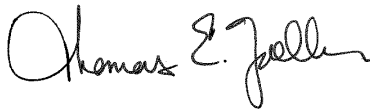
Henry M. Ogrodinski
President and CEO
National Association of State
Aviation Officials



Charles Barclay
President
American Association of Airport Executives



Roger Cohen
President
Regional Airline Association



Thomas E. Zoeller
President
National Air Carrier Association

CC: The Honorable Byron Dorgan
The Honorable Jim DeMint