

January 14, 2002

Docket Clerk, Docket OST-2001-10885
Department of Transportation
400 7th Street, SW,
Room PL-401
Washington, D.C. 20590

Re: Procedures for Compensation of Air Carriers

Dear Sir or Madam:

We operate an air ambulance company based in Oklahoma City, Oklahoma. We operate two helicopter air ambulances from this location.

We did experience direct and indirect financial losses as a result of the terrorist attacks of September 11, 2001. We are pleased to learn that Congress and the DOT have recognized that the efforts to implement the initial relief efforts were targeted at commercial airlines, and did not adequately provide a mechanism for relief for air ambulances.

We support the proposal from the Association of Air Medical Services (AAMS) to base the relief on the number of missed transports, determined by comparing the number patients transported during the 30 days prior to September 11th, with the 30 days following September 11th. During the formal application process, we will be able to provide you with accurate and auditable records demonstrating the change in the number of transports for the time period specified. Preliminarily, we have estimated that we experienced a decrease of approximately 20 transports during this time.

We also support the proposal from AAMS that the relief be based on the proposed new Medicare Fee Schedule rates. While these rates are far below our charges, and less than we would have expected to collect on the missed transports, we understand that it is a reasonable standard to be used nationally.

Our average one-way (loaded) transport distance is 69 statute miles.

We look forward to making a formal application for relief when the process has been formalized.

Sincerely,

Joy Englund

Program Director