

January 14, 2002

Docket Clerk, Docket OST-2001-10885
Department of Transportation
400 Seventh 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 Rochester, Minnesota and Eau Claire, Wisconsin. We operate 2 helicopters and 1 fixed-wing air ambulance. The coverage area for our helicopter service is 200 statute miles in any direction from the two bases and our fixed-wing operations cover the continental U.S. and Canada.

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 of patients transported by helicopter 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 24 helicopter transports during this time.

In looking at our fixed-wing program, we can provide you information showing that since September 11th, we have experienced an even more dramatic decrease in volumes. A four-year average of flights between September and December shows typical volumes to be 116 total flights during those four months compared to 62 flights this year for those months. The difference is 54 flights or 13+ flights/month.

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 50 statute miles for helicopter, and 440 statute miles for fixed-wing transports.

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

Sincerely,

Thomas E. Allenstein RN
Mayo Medical Transport

TEA:mjk