

**BEFORE THE  
U.S. DEPARTMENT OF TRANSPORTATION  
OFFICE OF THE SECRETARY  
FEDERAL AVIATION ADMINISTRATION  
WASHINGTON, D.C.**

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**In the matter of:** :  
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**Notice of Proposed Amendments** :   
**To Policy Regarding** : **Docket No. FAA-2008-0036**  
**Airport Rates and Charges** :

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**REQUEST TO EXTEND PUBLIC COMMENT PERIOD**

The International Air Transport Association (IATA), on behalf of its members<sup>1</sup> and in strong support of the similar request submitted by the Air Transport Association of America, Inc. (ATA), the Cargo Airline Association (CAA), the National Air Carrier Association (NACA), and the Regional Airline Association (RAA), respectfully requests that the public comment period for this proceeding be extended 30 days to April 2, 2008.

Published in the Federal Register on January 17, 2008, proposed amendments to the Department of Transportation's (DOT) 1996 Policy Regarding Airport Rates and Charges (61 Fed. Reg. 31994 -June 21, 1996). are of great consequence and concern to IATA and to its members. Portrayed as "two modifications and one clarification," the proposed amendments represent a significant policy change, particularly as it relates to the proposed relaxation of existing constraints on airports charging authorities. It is incumbent on IATA as a trade association to consult closely with the 78 IATA members directly impacted by these proposed changes in order to submit comprehensive comments back to DOT.

The DOT proposal includes significant presentation on DOT's interpretation of the case law in this highly litigated area. It also raises implications in terms of the impact these

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<sup>1</sup> IATA represents 235 air carriers worldwide, 78 of which serve the United States and represent approximately 75% of all US air traffic. Those 78 members include: Aer Lingus; Aeroflot; Aerolineas Argentinas; Aeromexico; Aeropostal Alas de Venezuela; Aerosvit Airlines; Air Berlin; Air Canada; Air China Limited; Air France; Air India; Air Jamaica Limited; Air New Zealand; Air Pacific; Air Tahiti Nui; Alaska Airlines; Alitalia S.P.A.; All Nippon Airways; Aloha Airlines; American Airlines; Asiana; Austrian; Avianca; BMI; British Airways; Cathay Pacific; China Airlines; China Eastern; China Southern Airlines; Continental Airlines; Copa Airlines; Czech Airlines; Delta Air Lines; Egyptair; El Al; Emirates; Etihad Airlines; EVA Air; Far Eastern Air Transport; Finnair; Iberia; Icelandair; JALways Co. Ltd.; Japan Airlines; Jet Airways; KLM; Korean Air; Kuwait Airways; LACSA; Lan Airline; Lan Argentina; Lan Peru; LanEcuador; LOT Polish Airlines; LTU; Lufthansa; Malaysia Airlines; Mexicana; Northwest Airlines; Olympic Airlines S.A.; PAL; Qantas; Qatar Airways; Royal Air Maroc; Royal Jordanian; SAA; SAS; Saudi Arabian Airlines; SIA; SWISS; TACA; TAM Linhas Aereas; TAP – Air Portugal; Thai Airways; THY; United Airlines; US Airways, Inc.; Virgin Atlantic.

changes could have on existing U.S. aviation bilateral agreements. Both areas require a significant commitment of time and resources of the organization. We do not believe that we can consult with member airlines and complete this research in a reasonable and useful fashion by the March 3, 2008 deadline.

Given all of the above, IATA respectfully requests that the public comment period for this proceeding be extended for an additional 30 days, until April 2, 2008.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Douglas E. Lavin". The signature is fluid and cursive, with a long horizontal stroke at the end.

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Douglas E. Lavin  
Regional Vice President, North America  
INTERNATIONAL AIR TRANSPORT ASSOCIATION

601 Pennsylvania Ave., NW  
Suite 300  
Washington, DC 20004  
(202) 628-9292

February 4, 2008