

March 26, 2008

Docket Operations  
U.S. Department of Transportation  
West Building, Ground Floor  
Room W12-140, Routing Symbol M-30  
1200 New Jersey Avenue, SE  
Washington, DC 20590

**RE: DOCKET NO. FAA-2008-0036, POLICY REGARDING AIRPORT RATES AND CHARGES**

The National Air Transportation Association (NATA), the voice of aviation business, is the public policy group representing the interests of aviation businesses before Congress, federal agencies and state governments. NATA's 2,000 member companies own, operate and service aircraft. These companies provide for the needs of the traveling public by offering services and products to aircraft operators and others such as fuel sales, aircraft maintenance, parts sales, storage, rental, airline servicing, flight training, Part 135 on-demand air charter, fractional aircraft program management and scheduled commuter operations in smaller aircraft. NATA members are a vital link in the aviation industry providing services to the general public, airlines, general aviation and the military.

The members of NATA do not support the Federal Aviation Administration's (FAA) proposed policy to increase airport rates based on congestion occurring at specific times of day at certain airports across the country, otherwise known as congestion pricing.

First, the proposed amendment is a short-term fix to a long-term problem. As modernization of the National Airspace System (NAS) continues to take shape, NATA believes the FAA should concentrate on runway expansions and other airport improvements to aid traffic flow at the most congested airports. Runway construction has been the means of increasing capacity for many years. We feel that improving and expanding the infrastructure is the best solution to alleviate crowded airports.

Second, air traffic control modernization is critical to easing airport traffic. The on-demand air charter industry, including those companies operating technologically advanced aircraft, such as very light jets, is committed to supporting the vision for transformation of the NAS led by the U.S. Joint Planning and Development Office (JPDO).

Finally, NATA is concerned that the increase in costs during peak periods at congested airports will be passed down to the consumer. Thus, large commercial air carriers operating under Part 121 will not be forced to change their flight schedules in response to a rate increase during peak periods, although they may use

**Comments of the National Air Transportation Association on Docket No. FAA-2008-0036, Policy  
Regarding Airport Rates And Charges  
March 26, 2008**

**Page 2 of 2**

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larger aircraft. Ultimately, the charges per passenger on the airlines will not be significant enough to dissuade any passenger from flying at a particular time or convince an airline to reduce operational levels. The on-demand operators certificated under Part 135 and private aircraft operations under Part 91 will be disproportionately affected by such changes and deterred from airports with heavy traffic. In the case of air charter operations, by regulation aircraft are prohibited from carrying more than 30 passengers, so the burden of increased fees is carried by fewer passengers.

Although the proposed amendments are intended to provide greater flexibility to operators of congested airports and to encourage the use of alternative airports to meet regional air service needs, NATA is opposed to any change in airport rates for the foregoing reasons.

NATA appreciates the opportunity to present these comments. The association is available to the Department of Transportation and the FAA to address questions regarding airport rates and charges.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric R. Byer". The signature is fluid and cursive, with the first name "Eric" being the most prominent.

Eric R. Byer  
Vice President, Government and Industry Affairs