

April 3, 2008

United States Department of Transportation
Office of the Secretary
Federal Aviation Administration

Re: Docket No. FAA-2008-0036
Notice of Proposed Rulemaking on the Policy Regarding Airport Rates
and Charges

Comments:

Des Moines International Airport, Des Moines, Iowa is pleased to submit comments to the Department of Transportation's Notice of Proposed Rulemaking on its Policy Regarding Airport Rates and Charges, 73 Fed. Reg. 3310 (NPRM) (Jan. 17, 2008). While this NPRM raises issues of concern to all airports, particularly "congested airports" as defined in the NPRM, it also fails to address the possible degradation of airline service for smaller communities resulting from the implementation of the provisions within the proposed rule. Airports that serve small communities typically have a limited number of air service options, and the majority of service opportunities frequently are to "congested airports" which are critical for providing access to worldwide destinations and business hubs. Des Moines International Airport's air service profile includes approximately 161 flights per week to "congested airports." Over 270,000 Des Moines passengers travel to and from these hubs. Additionally, regional jets are the predominant aircraft providing service for these routes with scheduled operations during peak periods to maximize the benefit to the connecting hub, especially in scenarios where there are a minimum number of flight options. Optimally, airline schedules are generally designed to allow domestic business travelers to complete their travel and business to major east coast and central destinations, if necessary, in one day which is an important ingredient in community economic development. Small community air service development is difficult to sustain and may not be feasible if there are requirements for higher fees or larger aircraft on existing or future routes. The NPRM does not allow the creation of local exemptions for small communities.

We encourage the DOT to work with large and small airports and the air carriers to develop a clear set of guidelines that will protect and preserve existing small community access while allowing airports to use innovative methods to address congestion and delay issues.

Sincerely,



Craig S. Smith, A.A.E.
Aviation Director

Cc: Airport Board Members



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