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February 24, 2003

Mr. John Kiser  
U.S. Department of Transportation  
400 Seventh Street, S.W.  
Washington, D.C. 20590

DEPT OF TRANSPORTATION  
2003 FEB 25 A 11:09  
MAILS

RE: Request for Extension of Time for Replies to IATA Application for Approval of  
Agreement—Docket OST-2003-14480-9

Dear Mr. Kiser:

The National Industrial Transportation League hereby files this letter in support of the requests for a 90-day extension of the date for submitting comments in response to the Application for Approval of Agreements filed by the International Air Transport Association on February 7, 2003. At least two such requests have been made by groups representing the users of air transportation services.

The League is one of the oldest and largest national associations representing companies engaged in the transportation of goods in both domestic and international commerce. The League has over 700 member companies that range from some of the largest users of transportation systems around the world to smaller companies engaged in the domestic shipment of goods. Members of the League ship substantial quantities of goods both domestically and in international commerce and many members of the League are shippers of air freight.

In its lengthy proposal, IATA seeks to modify Resolution 502 by imposing a new density standard to be applied to air cargo considered to have a low density. The proposal is not without controversy as it could impose significant change and costs on air freight shippers. Accordingly, the League submits that the normal 21-day comment period is inadequate and will not provide the transportation community with sufficient time to analyze IATA's extensive application, determine its impact, and prepare appropriate comments.

Granting the extension will better serve the transportation community by allowing for the development of a more thorough and meaningful record on the IATA proposal. In addition, more time would enable the League to confer with shippers overseas that have already expressed concerns to IATA about the proposal.

Moreover, allowing for more time to respond to the application will not prejudice IATA, which took many months to prepare and resubmit the proposal to DOT, and it does not seek to implement the change until late in the year.

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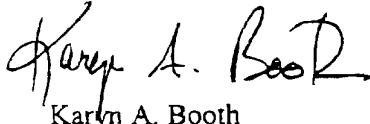
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Therefore, the League respectfully requests that the requests for a 90-day extension of the deadline for submitting comments on the LATA proposal be granted.

Respectfully submitted,



Karyn A. Booth  
Attorney for  
The National Industrial Transportation League

cc: Peter Gatti  
Jeffrey Lehman  
Hon. Read Van de Water  
Asst. Secretary for Aviation and Int'l. Affairs  
David M. O'Connor, IATA Attorney