

December 18, 2008

Ms. Mary D. Nichols
Chairwoman
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

**RE: CALIFORNIA AIR RESOURCES BOARD RULE CONCERNING GROUND
SUPPORT EQUIPMENT**

Dear Chairwoman Nichols:

The National Air Transportation Association (NATA), the voice of aviation business, is the public policy group representing the interests of aviation businesses before the 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.

On behalf of NATA, I am writing to express my concern with the approaching compliance deadline for Ground Support Equipment (GSE) at airports known as Off-Road Large Spark-Ignition (LSI) Equipment. While the rule was published on May 12, 2007, and initial compliance is expected by January 1, 2009, most GSE operators are unaware of the compliance deadline. As you may know, GSE operators are ground handling companies at airports doing business independently from the commercial airlines. While the Air Transport Association, which represents the U.S. airlines, was involved in this rulemaking process, ground handling companies in the State of California were left out of the process and were unaware of the rule's applicability to their businesses when operating GSE including Off-Road LSI Equipment.

NATA is concerned that many ground handling companies are still unaware of this compliance deadline and, therefore, will be in violation of the new mandate starting January 1, 2009. In addition, many of those companies affected by this new deadline are small businesses, as defined by the U.S. Small Business Administration, and would have to meet compliance options that are extremely costly. Providing businesses that operate Off-Road LSI Equipment additional time to budget for replacing or retrofitting equipment as required in this new rule is critical to their continued financial viability, especially with the U.S. economy in a recession.

Ms. Mary D. Nichols
December 18, 2008

Page 2 of 2

Therefore, I respectfully request that you extend the compliance deadline for all GSE to January 2011. This extension will allow the ground handling community the time needed to make changes without placing significant financial constraints on this important sector of the aviation industry.

Sincerely,

A handwritten signature in black ink, appearing to read "James K. Coyne". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

James K. Coyne
President

cc: Governor Arnold Schwarzenegger