



May 8, 2009

The Honorable James L. Oberstar
Chairman
House Committee on Transportation and Infrastructure
2165 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Oberstar:

On behalf of the Transportation Trades Department, AFL-CIO (TTD) I am writing to reiterate our support for the aircraft rescue and firefighting (ARFF) standards language included in the FAA Reauthorization Act of 2009 (H.R. 915). As you know, Section 311 directs the FAA to update current regulations and requirements to ensure that firefighters have the training and resources to properly respond to emergency situations and to rescue passengers and aircraft crewmembers.

Despite the fact that there is widespread agreement that the current standards need to be improved, some in the airport industry are attempting to strip Section 311 complaining about the costs of improved standards and arguing that the provision would do nothing to enhance safety. The notion that updated and strengthened ARFF standards would not enhance safety is outrageous and is simply an attempt by airports to avoid making needed safety investments.

The fact is ARFF standards are deficient and have not been substantively updated since 1988. At present, airport fire department staffing levels, infrastructure and equipment are inadequate to effectively respond to passenger rescue and evacuation. Air travel has changed significantly since the FAA last updated its firefighting regulations over 20 years ago. Larger planes are flying at capacity carrying increased amounts of fuel, air traffic congestion has risen exponentially and runway incursions continue to be a concern. Section 311 requires a rulemaking to address critical safety issues such as the mission of aircraft rescue and firefighting personnel, proper staffing levels, response times, hazmat handling, vehicle deployment and equipment modernization.

Ironically, the ARFF language now opposed by some in the airport industry was the product of a compromise drafted to address their concerns. While the exact cost to airports is unknown, the bill requires the FAA to assess the potential impact of any changes to firefighting standards on airports. Concerns about increased costs and the impact on rural airports can be taken into consideration during the rulemaking process. Furthermore, while the bill requires, to the extent practical, the final rule to be consistent with national voluntary consensus standards for aircraft rescue and firefighting services at airports, it does not require the FAA to adopt these standards across the board.

Transportation Trades Department, AFL-CIO

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Edward Wytkind, President • Patricia Friend, Secretary-Treasurer



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The ARFF language in H.R. 915 promotes a fair and balanced solution to this problem and is a good step toward updating the FAA's firefighting standards. Instead of attempting to stand in the way of this needed safety improvement, we hope the airport community will focus on passing a strong FAA bill that will support the entire aviation industry and provide airports with direct and needed funding. I know that will be TTD's focus over the next several weeks and months and we look forward to working with you on that objective.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Wytkind". The signature is fluid and somewhat abstract, with several loops and a long horizontal stroke at the end.

Edward Wytkind
President

cc: The Honorable John L. Mica
The Honorable Jerry F. Costello
The Honorable Thomas E. Petri
Transportation and Infrastructure Committee