



*Cargo Airline Association  
Briefing on  
Reduction of Fuel Tank Flammability  
in Transport Category Aircraft  
for  
Office of Management and Budget*

April 8, 2008

# *Cargo Airline Association Membership*

- \* ABX Air, Inc.
- \* Atlas Air, Inc.
- \* FedEx Express
- \* United Parcel Service
  - Air Transport International
  - Capital Cargo International
  - DHL Express
  - First Air
  - Kalitta Air
  
- \* Member, Board of Directors

## *Fuel Tank Flammability (FTF) NPRM*

- FAA issued the FTF NPRM on November 23, 2005.
- The NPRM proposes to set new rules and performance standards for fuel tank inerting technology intended to reduce the chances of a catastrophic fuel-tank explosion on an aircraft.
- Comments were filed on May 8, 2006, with opposition from the airline industry.

## *Application to All-cargo Aircraft*

- FAA's own cost-benefit study cannot make the case to include all-cargo aircraft in its proposal.
- FAA concludes that the risk of fuel tank flammability may be lower for all-cargo operations than for passenger operations based on the cargo carrier's unique operational characteristics.
- The proposal therefore does not extend to all-cargo.

## *Concerns of the Cargo Industry*

- If FAA does not maintain the position it put forth in the NPRM, FAA must clarify the application of and provide the industry an opportunity for notice and comment to any part of the rule applicable to all-cargo aircraft in-production and new design and any passenger aircraft acquired by cargo airlines and converted for all-cargo carriage before a Final Rule is issued.

## *Additional Issues and Questions*

- Since issuance of NPRM, manufacturers began producing aircraft with better fuel tank designs – has FAA accounted for those benefits?
- Industry costs continue to increase as systems are defined; replacement membrane costs alone are estimated at \$150K-\$200K per ship set
- SFAR 88 technical modifications are now in place and the benefits of such have yet to be realized or even quantified. Has FAA accounted for SFAR 88 effectiveness properly?

# *CAA Positions*

- CAA supports the exclusion of all-cargo aircraft and any departure from such a position taken by the agency requires the industry be given a further opportunity for notice and comment.
- The safety of the airline industry is dependent on adequate maintenance of its fleet and their technical components.
- Standardization of fleet type and technology is a factor which FAA should consider carefully in its analyses, especially since one particular inerting technology is not being mandated.

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