

February 14, 2025

Anthony Butters
Manager, Airports Safety Policy Branch (AAS-310)
Office of Airports Safety and Standards
Federal Aviation Administration
800 Independence Ave., S.W.
Washington, DC 20591

RE: Federal Aviation Administration, Information Collection; Request for Comments
Clearance of Approval of Information Collection to Provide for the Amount of Aqueous
Film Forming Foam (AFFF) Located at Part 139 Airports
Docket No. FAA-2024-2216 (Dec. 13, 2024)

Dear Mr. Butters:

The American Association of Airport Executives (AAAE), the world's largest professional organization for airport executives, appreciates the opportunity to provide feedback on the Federal Aviation Administration's (FAA) information collection regarding the national transition to fluorine-free firefighting foam (F3) at Part 139 certificated airports. AAAE's 11,000 members represent more than 950 airports, along with hundreds of companies and organizations that support the airport industry. In recent years, we have dedicated significant time toward addressing concerns surrounding AFFF extinguishing agents, which FAA has required airports to use for decades, including helping airports navigate the transition to F3 and advocating to mitigate the financial burden on airports for the transition.

We recognize the proposed information collection initiative is intended to comply with a directive in section 762 of the FAA Reauthorization Act of 2024, which requires FAA to prepare a national transition plan and regular progress reports for the appropriate committees in Congress. These updates must include, among other things: "A comprehensive list of the amount of [AFFF] at each part 139 airport as of the date of the submission of the progress report, including the amount of such firefighting foam held in firefighting equipment and the number of gallons regularly kept in reserve at each such airport."

We have one major recommendation to improve the utility and clarity of the required information collection. Specifically, FAA's request to airports should be limited to AFFF held by Part 139 airports and should not include quantities maintained by airport tenants. Part 139 certificated airports are not required to track or report any AFFF inventories that may be held by their tenants, and FAA's jurisdiction primarily covers airport operations and safety, not tenant activities. Requiring airport operators to report tenant-owned AFFF, such as foam agents

in hangar foam fire suppression systems, would be inappropriate, lead to inconsistent results from airport to airport, and place an unnecessary burden on airports.

Moreover, the primary goal of the national transition plan is to provide guidance to airports and ensure an orderly transition from AFFF to F3 agents for purposes of airfield firefighting operations, not the transition of hangar foam fire suppression systems. Thus, any AFFF quantities that may be held by third-party tenants at the airport should be excluded from airport-level reporting. Limiting reporting in this manner would allow FAA to (a) effectively monitor the transition to F3 without imposing undue administrative burdens or exceeding its authority and (b) provide Congress with a more accurate summary report of the total amount of AFFF that is most relevant to the national transition plan.

AAAE appreciates FAA's efforts to support a smooth transition to F3 at Part 139 airports and the opportunity to comment on the proposed information collection. Please do not hesitate to reach out if you have any questions or require any additional information. I can be reached at megan.eisenstein@aaae.org or at (571) 895-7726.

Sincerely,



Megan Eisenstein
Associate Vice President, Regulatory Affairs