

February 10, 2012

Docket Operations
M-30
U.S. Department of Transportation (DOT)
1200 New Jersey Avenue, SE
Room W12-140
West Building Ground Floor
Washington, DC 20590-0001

Re: Docket No. FAA-2012-0007, Authorization To Use Lower Than Standard Takeoff, Approach and Landing Minimums at Military and Foreign Airports

The National Business Aviation Association (NBAA) represents the aviation interests of over 8,000 Member companies that use business aircraft to support their company travel needs. Many Part 135 Operators in NBAA's Membership utilize Lower Than Standard Minimums Authorizations and we appreciate the opportunity to offer these comments in support of this rulemaking.

NBAA fully supports the FAA's efforts to amend 14 CFR § 135.225(f) to permit Part 135 operators the ability to conduct lower than standard visibility operations at foreign and military airports. We applaud the FAA's decision to expedite this rule change through the issuance of this direct final rule, so as not to require more operators to pursue an exemption under Part 11 to obtain relief from this particular provision of the Part 135 regulations.

We would expect the FAA to reflect the changes covered in this rule change in Operations Specifications that affect takeoff, approach and landing. NBAA and our Member companies would appreciate those associated changes and guidance updates being completed as expeditiously as possible.

Thank you for the opportunity to submit these comments. Please contact us if we can provide any additional information.

Sincerely,



Douglas Carr
Vice President
Safety, Security & Regulation