



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798
Telephone (301) 695-2000 • Fax (301) 695-2375
www.aopa.org

October 11, 2007

Mr. Daniel Baldwin
Assistant Commissioner
Office of International Trade Regulations and Rulings
U.S. Customs and Border Protection
1300 Pennsylvania Avenue, NW (Mint Annex)
Washington, DC 20229

RE: Request to Extend Comment Period. USCBP-2007-0064 Advance Information on Private Aircraft Arriving and Departing the United States

The Aircraft Owners and Pilots Association (AOPA), representing more than 413,000 members, or two-thirds of the nation's general aviation pilots, requests that the comment period for the Customs and Border Protection's (CBP) notice of proposed rulemaking (NPRM) titled Advance Information on Private Aircraft Arriving and Departing the United States be extended from its current 60 day period (closing November 19, 2007) to 120 days (closing January 18, 2008).

A two-month extension is essential to ensure that the general aviation community, which will be significantly impacted by this rule, has an adequate opportunity to comment. The uniquely diverse nature of the general aviation industry, the logistical challenges of notifying and educating general aviation pilots, and the need for more time to study and to suggest practical alternatives all support the need for a modest two-month extension to comment.

First, general aviation is a diverse industry with the types of operations varying greatly, and unlike the airlines, general aviation has limited access to resources and support facilities when traveling internationally. International general aviation flights range from the recreational pilots flying family and friends across the border for short vacations to corporate aircraft traveling on business flights. This wide diversity presents unique challenges to the general aviation industry in alerting and educating those who will be most impacted by the proposed changes.

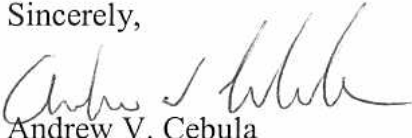
Second, AOPA and others in the general aviation community need additional time to comprehend and evaluate more fully the impact of the proposed changes to the border crossing process. As evidenced by the more than 500 comments already submitted, this NPRM has created a significant amount of concern by operators of private aircraft. Because the proposal affects individuals, scattered throughout this country and others, additional time is also needed to educate pilots and aircraft operators about the specific requirements proposed by CBP.

Mr. Daniel Baldwin
Page 2
October 11, 2007

Finally, extending the comment period is essential to provide the general aviation community the opportunity to develop possible alternatives to address specific concerns within the rule such as the proposed electronic only submission of passenger and other data to CBP prior to border crossing flights.

AOPA asks that CBP consider this request for an extension to the comment period in a timely manner.

Sincerely,



Andrew V. Cebula
Executive Vice President
Government Affairs