

January 16, 2024

Email Delivery and Read Receipt  
Requested: drugabatement@faa.gov

Request submitted to docket: Docket No. FAA-2012-1058

Nancy Rodriguez-Brown  
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RE: Docket No. FAA-2012-1058 – Drug and Alcohol Testing of Certificated Repair  
Station Employees Located Outside of the United States  
Request for Extension of Comment Period

Dear Ms. Rodriguez-Brown:

The undersigned organizations request a 90-day extension to the FAA's published comment period for the above referenced [notice of proposed rulemaking](#) (NPRM).

The rulemaking was issued during the holiday season, which represents "down time" for many companies and individuals but is actually a critically busy period for the very air carrier personnel – and their contractors – most closely impacted by the proposal. The extra time will allow for the necessary review and correspondence among and between the representatives of each organization, ensuring "the Coalition of Industry Groups" (as it is identified by the NPRM) can continue to provide broad analysis of the proposed rule. In fact, this collection of industry associations has grown since the 2014 effort.

Allowing this "Coalition" to continue its role in this process, particularly given the international complexity of the matter, surely constitutes good cause for the requested extension. Allowing ample time for review and comment, particularly considering the 11 years already invested by the government and industry in the process, is in the public interest.<sup>1</sup>

Sincerely,

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<sup>1</sup> Title 14 Code of Federal Regulations (CFR) § 11.47 provides that the FAA will grant more time for the public to file comments when any person's request shows "good cause for the extension and that an extension is in the public interest."

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