

March 30, 2021

Dear Sir or Madam,

The National Air Transportation Association (NATA) submits this correspondence in support of the attached request for modification to section 5.1.12 of the 2017 and proposed 2022 revisions of *NFPA 407-Standard for Aircraft Fuel Servicing*.

The requirements of 5.1.12 call for the installation of a third means of overfill protection for the bottom loading of mobile refuelers by requiring all new AND EXISTING loading racks to be equipped with automatic shut-off systems.

These requirements are redundant, without merit, and not based in any statistical evidence or data. Additionally, the removal of these requirements has majority support of the NFPA Aircraft Fuel Servicing Technical Committee and NATA's GA Fuel Handling Subcommittee, along with hundreds of FBOs, fuel farm operators, state aviation associations, environmental engineers, and Fire Marshals from across the United States* (TIA 1558 and TIA 1539, Results and Public Comments).

The aviation fueling industry has a proven record demonstrating that existing overfill protection requirements for mobile refuelers and bottom loading operations are safe and effective. As the Authority Having Jurisdiction, we request that you exercise your authority under section 1.3.4 of the 2017 and proposed 2022 revisions of *NFPA 407* and grant the attached request for modification from the retroactive requirements of 5.1.12.

Respectfully,



Timothy Obitts
President & CEO
National Air Transportation Association



Steve Berry
Manager of Fuel Quality and Safety
National Air Transportation Association

Works Cited

TIA 1558 and TIA 1539, Results and Public Comments

<https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=407&tab=nextedition>