

in their proposal authorizing or requiring the federal government to develop criteria for acceptable levels of noise; or for the application of such criteria to present or future aircraft.

Section "b"

This section dealing with modification or revocation of type certificates is equally ineffective, because in *Section a* the only thing required in the type certificate is compliance with *measurement* standards.

Section "c"

This section completely removes from the authority of the federal government any power to modify *airworthiness* certificates.

Since under the ATA proposal the *type* certificate (which is issued to the manufacturer) had no meaningful requirements in it with respect to noise, the ATA would then preclude government control over the *airworthiness* certificate which the airline must have to prove that the aircraft has met all the safety and noise standards.

Completely absent from the ATA proposal is any requirement that the aircraft be operated in compliance with any standards of acceptable noise levels.

In conclusion, it is the position of the Airport Operators Council International that an aircraft noise bill must be enacted which will authorize the Secretary of the Department of Transportation to:

1. Prescribe and amend standards for the measurement of aircraft noise, and abatement of aircraft noise,
2. Prescribe standards, rules and regulations to provide for the control and abatement of aircraft noise,
3. Apply such standards, rules and regulations to the issuance of *all* aircraft type certificates, airworthiness certificates and airline operating certificates, and
4. Amend, modify, suspend or revoke aircraft type certificates, airworthiness certificates and operating certificates in order to insure the control and abatement of aircraft noise.

NATIONAL ASSOCIATION OF STATE AVIATION OFFICIALS,
Washington, D.C., November 14, 1967.

Hon. HARLEY O. STAGGERS,
Chairman, Committee on Interstate and Foreign Commerce,
House of Representatives, Washington, D.C.

DEAR MR. STAGGERS: The National Association of State Aviation Officials commends you for scheduling hearings on H.R. 3400 and related bills pertaining to aircraft noise abatement.

Enclosed for your information are several copies of a resolution adopted unanimously by NASAO members during the Association's annual meeting on September 28, 1967. The resolution urges enactment of legislation such as H.R. 3400, which would authorize and direct the Secretary of Transportation to regulate aircraft certification and operation for noise abatement as well as safety purposes.

During the hearings your Committee is urged to give consideration to the following:

(a) The aircraft, particularly the jet engine, creates the noise and the problem, and therefore should be the prime target in any noise abatement program or regulatory action.

(b) Aircraft noise creates a very serious problem even in communities where there is presently no airport. This occurs when citizens who do not want to be subjected to aircraft noise vote down, or by court or other action, prevent the development of a much needed new airport, or the improvement of one already in existence. This is particularly true in the case of airports to accommodate the general aviation type aircraft, in both small communities and metropolitan areas.

(c) Apparently no practical unit of noise measurement has been developed or adopted which will permit accurate comparison of noise created by civil and military jet powered aircraft—small general aviation piston aircraft—and various types of surface noise. This is essential in order that citizens can be intelligently advised regarding the relative noise levels of various forms of transportation vehicles.

NASAO respectfully recommends favorable consideration and an early report