

June 22, 2018

Ms. Lirio Liu  
Director, Office of Rulemaking and ARAC Designated Federal Official  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

RE: Loadmaster Certification Working Group (LCWG) Recommendation Report

Dear Ms. Liu,

On June 21, 2018, the Loadmaster Certification Working Group (LCWG), tasked by the Aviation Rulemaking Advisory Committee (ARAC) on May 12, 2016 (81 Fed. Reg. 29609), presented its Recommendation Report to ARAC. By general consensus, the LCWG recommends the Federal Aviation Administration (FAA) require air carriers conducting special cargo operations under 14 CFR part 121 have an FAA-Approved Special Cargo Program.

ARAC voted to accept the LCWG's recommendation, therefore, I submit the report to the FAA for its consideration and acceptance. However, as the agency considers whether and how to implement the recommendation, ARAC feels strongly the implementation of an FAA-Approved Special Cargo Program would be best accomplished through a formal rulemaking process. Rulemaking would ensure all administrative protections, including notice and comment and further strengthen FAA's approval of the program, a crucial aspect of the recommendation. While the tasking from ARAC did not specify rulemaking was required, ARAC is certain rulemaking is the most appropriate path forward in this case.

As is customary, there was discussion among the ARAC members on this issue during the ARAC meeting. These discussions will be captured in the Minutes and we urge the agency to review those Minutes closely before determining how to implement this recommendation.

We urge the FAA to implement the LCWG recommendation as soon as possible through rulemaking and by the relevant program offices. Please accept the LCWG's Recommendation Report as completion of its tasking and please do not hesitate to contact me with any questions.

Sincerely yours,



Yvette A. Rose  
ARAC Chair

cc: David Oord, ARAC Vice Chair and ARAC Members  
Mark Phaneuf, LCWG Chair