



October 14, 2020

U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

To whom it may concern,

The Arlington Chamber of Commerce supports the proposed Control of Air Pollution From Airplanes and Airplane Engines: GHG Emission Standards and Test Procedures rule implementing carbon dioxide emissions standards for aircraft. Completion of this rule is critical for the environment, the regulated industry, and the United States economy.

The EPA standard is consistent with the standards agreed to by 190 countries and the U.N. International Civil Aviation Organization (ICAO). A U.S. standard in alignment with the ICAO standards is an important step in creating a level international playing field for American airplane manufacturers, which means that aircraft designed and built in the U.S. should be more competitive in the global marketplace.

During these challenging economic times as businesses fight to recover from the pandemic, certainty in the regulatory landscape is more important than ever before. We urge the Agency to finalize the rule by the end of 2020 to bolster our economic growth and environmental stewardship, especially as our nation and the aviation sector recover from the economic and public health crises.

Commercial airplane manufacturing accounts for nearly 8% of total U.S. exports and supports more than 1 million U.S. jobs. Approximately 75% of the aircraft built here are sold overseas. Aviation also contributes significantly to global economic activity and employment.

The ICAO standards are an important part of the industry's strategy to cut net global aviation carbon dioxide emissions to half of what they were in 2005 by 2050. These ambitious emission standards would formalize technology improvements into the airplane certification process that, until now, have been purely voluntary. We believe that when finalized, this rule will reduce emissions in the most cost-effective way. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Kate Bates". The signature is written in a cursive, flowing style.

Kate Bates  
President & CEO