

Flight Engineers' International Association

AFL-CIO

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June 23, 1970

Federal Aviation Administration
Office of the General Counsel
Attention: Rules Docket GC-24
800 Independence Avenue, S.W.
Washington, D. C. 20590

Gentlemen:

FEIA thanks the Administrator for allowing it to comment on the contents of the proposed changes regarding NPRM 70-14 - SMOKING ON AIRCRAFT OPERATED BY AIR CARRIERS, AIR TRAVEL CLUBS AND COMMERCIAL OPERATORS.

The Flight Engineers' International Association is aware that there are persons who are either allergic or annoyed by tobacco smoke. This would be true whether they were on an airplane or in any other surrounding. There is, however, merit to the argument that these persons become captives to the aircraft environment. Whether this environment is unhealthy because of tobacco smoke is a question FEIA is not qualified to judge. It may be unhealthy to one in one-thousand, or one in one-hundred. It appears unlikely, especially with the improved ventilation systems of the jet aircraft, that it is unhealthy (because of tobacco smoke reasons) for a substantial percentage of passengers.

To enter into Regulations to control environment might indeed open a whole new field of questions and possible regulations. For example, is the very low humidity level of pressurized aircraft injurious to the health of passengers? As many passengers as tobacco smoke is injurious to? How about kerosene exhaust fumes around airports and in airplanes?

FEIA does believe that the air carriers can (some do) provide separate parts of the passenger cabin for smokers. This approach could be expanded to other carriers. FAA could encourage such procedures. FEIA doubts the wisdom or necessity of adopting Regulations however, unless the results of joint study presently underway of the FAA and HEW indicate otherwise.

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Thank you for the consideration I know these
comments will receive.

Sincerely,

William A. Gill, Jr.
William A. Gill, Jr.
President

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