(If no letterhead)

Company Name

Accountable Executive

Company Address

Date

Addressee Name

Addressee Title

Address

Dear <INSERT NAME OF AUTHORITY HAVING JURISDICTION HERE >.

<NAME OF YOUR COMPANY HERE> has safely performed bottom loading operations of our mobile refuelers for <INSERT # OF YEARS HERE>. We strictly follow the existing requirements defined within *NFPA 407- Standard for Aircraft Fuel Servicing* and industry best practices including:

1. Utilizing only mobile refuelers equipped with functional high-level shut-off devices (aka “Jet Level Sensors”)
2. Testing the high-level shut-off devices of each mobile refueler for satisfactory operation daily and at the start of every bottom loading operation using the “pre-check” valve
3. Utilizing a dead-man system and remaining with the loading operation until it is complete
4. Training all relevant staff in the safety procedures and over-fill protection practices above

The requirements for a third over-fill protection system at <NAME OF YOUR COMPANY HERE> is impractical and unnecessary, given the double-redundant safety features (high-level shut-offs on mobile refuelers and bottom loading via dead-man device) in place.

As the Authority Having Jurisdiction (AHJ), it is within your jurisdiction to grant modifications to any retroactive requirement of NFPA 407 as per section 1.3.4:

*The retroactive requirements of this standard shall be permitted to be modified if their application clearly would be impractical in the judgment of the authority having jurisdiction, and only where it is clearly evident that a reasonable degree of safety is provided.*

With our existing over-fill protection systems and operational procedures providing a demonstrated history of safety and reliability, we kindly request a written modification from the retroactive requirements defined in section 5.1.12 of NFPA 407.

Thank you,

<NAME AND SIGNATURE OF ACCOUNTABLE EXECUTIVE HERE>