

# Aerospace Medical Association



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US Department of Transportation  
400 7<sup>th</sup> Street, SW  
Nassif Building, Rm. PL-401  
Washington, DC 20590-0001

Re: Document Number OST-2005-22298

TO WHOM IT MAY CONCERN:

The Aerospace Medical Association (AsMA) respectfully submits to you our response to the above Docket entitled Nondiscrimination on the Basis of Disability in Air Travel – Medical Oxygen and Portable Respiration Assistive Devices.

As practitioners of aerospace medicine, we have been very mindful of the difficulty facing commercial passengers who require inflight medical oxygen. The system employed by U.S. air carriers today is unsatisfactory and inconvenient. For understandable security reasons, passengers can use only oxygen equipment that is certified and provided by the airline. However, the oxygen equipment is provided only during the flight. Therefore, in order for the passenger to have a continuous supply of oxygen, arrangements must be made with ground vendors for the provision of oxygen in the airport preflight, post-flight, and during layovers. This is very cumbersome and inconvenient for passengers and possibly represents a health risk.

The development in recent years of portable molecular sieve oxygen equipment can alleviate these problems thereby providing a genuine service to passengers requiring inflight medical oxygen. These portable devices are light weight, easy to stow, and operate on batteries (or the aircraft electrical system). Furthermore, since they are concentrating oxygen from the air, there is no requirement to carry gaseous or liquid oxygen cylinders. With such a device, a passenger

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can easily have uninterrupted oxygen available from point of origin to final destination including layovers.

Consequently, we strongly recommend that passengers be permitted to use such portable oxygen devices with the proviso that they are compatible with aircraft systems. We would further recommend that airlines not be mandated in this regard. Rather, airlines should be given the freedom to decide their own policy.

Please feel free to contact me if you require further information and thank you very much for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Russell B. Rayman, M.D.".

Russell B. Rayman, M.D.  
Executive Director

RBR:jc