

June 11, 2003

Mr. James P. Ficaretta
Program Manager
Room 5150
U.S. Bureau of Alcohol, Tobacco, Firearms & Explosives
P.O. Box 50221
Washington, D.C. 20091-0221

SUBJECT: Response to Notice of Proposed Rulemaking No. 968, Commerce in Explosives (2000R-9P), 68 Fed. Reg. 4406 (Jan. 29, 2003)

Dear Mr. Ficaretta:

I am writing on behalf of the 22,000 members of the National Space Society to express our concern about proposed ATFE rule no. 968 that would irreparably impact model rocketry.

While I fully understand the need to review and reform existing regulations regarding explosive materials in light of critical homeland security matters, this proposed rule could substantially harm, if not outright eliminate, hobby and model rocket activities.

While I am certain that you have received numerous letters and other correspondence outlining the challenges in enforcing such a rule, as well as the technical rationale for providing an exemption for model rocketry, I want to highlight another vital reason for modifying the exemption for this activity.

As you may be aware, our nation is facing a critical shortage of U.S. citizens with technical and scientific training, which impacts critical industries such as the aerospace sector. In the November 2002 report issued by the Commission on the Future of the U.S. Aerospace Industry – a group commissioned by the President and the U.S. Congress – the Commission points out that “it is imperative that the U.S. aerospace industry remains healthy to preserve the balance of our leadership today and to ensure our continued leadership tomorrow.”

They place a tremendous emphasis on this continued leadership – which has implications for our future economic and national security – and focus on the “graying of the workforce,” writing that “compounding the [aerospace] workforce crisis is the failure of the U.S. K-12 education system properly equip U.S. students with the math, science, and technological skills needed to advance the U.S. aerospace industry.”

The field of model rocketry provides a fun, enjoyable pastime that simultaneously encourages students to consider technical fields for academic study, and the adults who participate in model rocketry often use their activities to support educational outreach in their local communities. To move forward with regulations that would substantially limit their activities could do grave harm to a recruiting mechanism that helps the United States maintain its long-term aerospace leadership.

I know that the model rocketry community is committed to cooperating with the federal government to help ensure domestic security, and I encourage you to work constructively with them as all parties seek a resolution to this matter. Additionally, the National Space Society

recommends the following change to (a) (7) in § 55.141 Exemptions to reflect the concerns mentioned above:

(v) Model rocket motors consisting of ammonium perchlorate composite propellant, black powder, or non-detonable rocket propellant and designed as single use motors or as reload kits;

(vi) Commercially manufactured black powder in quantities not to exceed two pounds, safety and pyrotechnic fuses, quick and slow matches, electric matches and igniters when used in model rocket motors.

I appreciate your consideration of this very serious matter, and hope that ATFE will consider modifying the exemptions to ensure we do not unintentionally harm our future leadership in aerospace. This is not just a matter that concerns us in the present, but one that reaches decades into our future, and I want to ensure the best and brightest young minds today choose to enter fields that will help the U.S. maintain its economic and military leadership around the globe in the years ahead.

If you would like additional information on the Commission report I referenced above, it is available online at www.aerospacecommission.gov. Please do not hesitate to contact me if I can provide additional information.

Sincerely,

<original signed by>

Brian E. Chase
Executive Director

cc: U.S. Senator Orrin Hatch, Chairman
U.S. Senator Patrick Leahy, Ranking Member
U.S. Senator Michael Enzi
U.S. Representative Jim Sensenbrenner, Jr., Chairman
U.S. Representative John Conyers, Jr., Ranking Member
U.S. Representative Ken Calvert
The Honorable John H. Marburger

BRIAN E. CHASE
Executive Director, National Space Society
600 Pennsylvania Avenue, S.E. | Suite 201
Washington, DC 20003
202.543.1900 | 202.546.4189 (fax)
Brian@NSS.org | www.nss.org