

May 7, 2026

Dan A. Ngo  
Manager, Part 11 Petitions Branch  
Office of Rulemaking  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

Mr. Ngo:

The undersigned organizations, representing broad segments of the business and aerospace community, write in support of the Boeing Company's (Boeing) petition requesting relief from the Federal Aviation Administration's (FAA) regulations prohibiting the issuance of an original certificate of airworthiness for certain subsonic jet airplanes that do not meet specific fuel efficiency and greenhouse gas emission limits. We support this petition because it will allow Boeing to meet customer demand while supporting vital aspects of the U.S. aerospace sector.

The U.S. aerospace sector is a cornerstone of the national economy and a major source of high-value manufacturing, innovation, and exports. In 2024, the aerospace and defense industry supported more than 2.23 million jobs across every state in the United States and represented approximately 1.4 percent of total U.S. employment. The industry also generated \$443 billion in economic value, representing 1.5 percent of U.S. GDP. In addition, U.S. aerospace and defense exports reached \$138.7 billion from 2023 to 2024, underscoring the sector's importance to American trade, manufacturing, and global competitiveness.

Just as important, the industry's success depends on a broad and deeply integrated supply chain. More than half of aerospace and defense employment comes from suppliers that provide parts, systems, materials, and services to final manufacturers. That network includes thousands of small and medium-sized businesses across the country and supports additional jobs in communities far beyond the final assembly line. In practical terms, every \$1 million in end-use sales supports approximately four jobs across manufacturing and the supply chain combined.

These facts certainly apply to this specific petition. Granting the petition would allow Boeing to meet customer demand by delivering 35 777 dedicated Freighters (777F) that are set to be completed after the January 1, 2028, implementation deadline of the new fuel efficiency standards set in 14 CFR Part 38. The 777F will not be in

compliance with these standards, though its successor aircraft, the 777-8F will be compliant (but won't be certified in time).

The 777F is the only widebody freighter currently in production and the most fuel efficient. If the FAA does not grant the exemption, older, less fuel-efficient aircraft would have to be used until the 777-8F is certified. Further, failure to grant the petition would have negative impacts for the communities responsible for producing Boeing's 777 aircraft across the United States over the two years it will take Boeing to complete this final order of 777Fs. The entire 777 family, for example, contributes more than \$5 billion in annual economic benefits and supports 380 suppliers and more than 100,000 jobs nationwide. The 777F is an important component of these benefits, while each exported 777F contributes a catalog value of \$440 million to the U.S. trade balance.

For these reasons, we respectfully support Boeing's petition and urge the FAA to grant the requested relief.

Thank you for your attention to this.

Sincerely,

U.S. Chamber of Commerce  
Brea Chamber of Commerce  
California Chamber of Commerce  
California Manufacturers and Technology Association  
Corona Chamber of Commerce  
Greater Modesto Chamber of Commerce  
Greater Riverside Chambers of Commerce  
Long Beach Area Chamber of Commerce  
Los Angeles Area Chamber of Commerce  
Newport Beach Chamber of Commerce  
North San Diego Business Chamber  
Orange County Business Council  
Pleasant Hill Chamber of Commerce  
Roseville Area Chamber of Commerce  
Sacramento Metro Chamber  
Santa Barbara Chamber of Commerce  
South Bay Association of Chambers of Commerce  
Torrance Area Chamber of Commerce  
Yorba Linda Chamber of Commerce  
Coral Springs Coconut Creek Regional Chamber of Commerce  
Florida Chamber of Commerce

Greater Fort Walton Beach Florida Chamber of Commerce  
Greater Miami Chamber of Commerce  
Greater Pompano Beach Chamber of Commerce  
Indian River County Chamber of Commerce  
Northeast Polk Chamber of Commerce  
Orlando Economic Partnership  
Putnam County Chamber of Commerce  
Santa Rosa County Chamber of Commerce  
Space Coast Chamber  
The Greater Palm Bay Chamber of Commerce  
Turkish American Chamber of Commerce of the South  
Cedar Rapids Metro Economic Alliance  
Greater Burlington Partnership  
Iowa Association of Business and Industry  
Keokuk Area Chamber of Commerce  
Barry County Chamber and Economic Development Alliance  
Battle Creek Area Chamber of Commerce  
Detroit Regional Chamber  
Flint & Genesee Chamber  
Greater Port Huron Area Chamber of Commerce  
Michigan Chamber of Commerce  
Muskegon Lakeshore Chamber of Commerce  
Northern Michigan Chamber Alliance  
Greater Binghamton Chamber of Commerce  
Greater Rochester Chamber of Commerce  
North Country Chamber of Commerce  
Queens Chamber of Commerce  
Sullivan County Chamber of Commerce and Industry Inc  
The Business Council of New York State  
Bismarck Mandan Chamber EDC  
Fargo Moorhead West Fargo Chamber of Commerce  
Greater North Dakota Chamber  
The Chamber Grand Forks / East Grand Forks  
Chillicothe Ross Chamber of Commerce  
Dayton Area Chamber of Commerce  
Licking County Chamber of Commerce  
Ohio Chamber of Commerce  
Ohio Manufacturers' Association  
Toledo Regional Chamber of Commerce  
Troy Area Chamber of Commerce  
West Chester - Liberty Chamber Alliance  
Association of Washington Business

Bellevue Chamber  
Coupeville Chamber of Commerce  
Covington Chamber of Commerce  
Des Moines Washington Chamber of Commerce  
Economic Alliance Snohomish County  
Greater Everett Chamber of Commerce  
Greater Spokane Valley Chamber of Commerce  
Greater Yakima Chamber of Commerce  
Pullman Chamber of Commerce  
Seattle Metropolitan Chamber of Commerce  
Seattle Southside Chamber of Commerce  
Tacoma-Pierce County Chamber  
Thurston County Chamber of Commerce  
Tri-City Regional Chamber of Commerce