

FROM

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DATE

27 March 2002

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OUR REFERENCE

EAA 412.0118/02

YOUR REFERENCE

Docket Management System
Docket No. FAA-2001-11032
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW.
Washington, DC 20590-0001

Subject: Comments to Docket No. FAA-2001-11032, FAR Amendment No. 25-106 and 121-288,
Security Considerations in the Design of the Flightdeck on Transport Category Airplanes

Dear Madam/Sir,

Airbus thanks the FAA for the opportunity to comment on the recent FAR Amendments 25-106 and 121-268, regarding Security Considerations in the Design of the Flightdeck on Transport Category Airplanes.

We support this rule, and are fully committed to provide our customers with compliant and cost-efficient solutions in the required timeframe. With this regard, we want to clarify that the estimated labor and aircraft downtime costs, as mentioned in the ATA comments submitted on March 20, 2002, were preliminary data for Airbus aircraft. These estimates are under review, and the final ones will be made available to our customers very soon.

We also support advisory circulars 25.795-1 and 25.795-2, which provide useful guidance on methods of compliance with the flightdeck door design requirements.

The new paragraph 121.313(j)(2) requires each operator to "establish methods to enable a flight attendant to enter the pilot compartment in the event that a flightcrew member becomes incapacitated." Although the rule preamble gives some explanation, we believe that an advisory circular is urgently needed on handling of the flightdeck door by both cockpit and cabin crew, not only in emergency cases, but also in routine operations.

Yours sincerely,

Original signed by:

Hermann Ganz
Vice-President, Airworthiness Standards
Product Integrity Division