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U.S. Department of Transportation
Docket Management System
Docket No. FAA-2002-12504
Room Plaza 401
400 Seventh Street, SW.,
Washington, DC 20590
U.S.A

Subject: Final Rule – Security Considerations for the Flightdeck on Foreign Operated Transport Category Airplanes

Docket No. FAA-2002-12504

Comments of Nippon Cargo Airlines Co., Ltd.

Nippon Cargo Airlines (hereinafter "NCA") appreciates this opportunity to comment on the Final Rule published by the Federal Aviation Administration (FAA) on June 21, 2002, and entitled "Security Considerations for the Flightdeck on Foreign Operated Transport Category Airplanes." The Final Rule requires all foreign carriers, whether carrying passengers or cargo installed with a flightdeck door, to change operational procedure and install reinforced flight deck doors in order to prevent unauthorized access to the cockpit.

In light of the tragic events of September 11, 2001, NCA fully supports appropriate measures to ensure aircraft security. Immediately following the release of Final Rule SFAR92-3, NCA installed internal locking devices in all of its eleven B747 Classic aircraft.

NCA has serious concerns however, about certain elements of the Final Rule. First, NCA does not believe that it is possible to meet the April 09, 2003 deadline established by the Final Rule. Boeing, NCA's supplier of the retrofit door kits, has predicted a substantial delivery delay and does not expect the kits to be shipped until mid-March 2003.
This delay is compounded by the fact that each aircraft must be taken out of service for 3 to 4 days of non-routine maintenance for the door installation.

Given the April 9, 2003 due date and the current door kit schedules, NCA is greatly concerned with the significant amount of time that most of our fleet will be out of service. Thus, NCA will suffer serious business losses in the course of implementing this Final Rule.

Therefore, NCA respectfully requests that the April 9, 2003 deadline be extended to November 1, 2003, the same deadline set by ICAO.

Additionally, NCA questions why the Final Rule applies to only those cargo aircraft currently equipped with a flightdeck door and not to other cargo aircraft. Absent a compelling reason for this distinction, NCA contends that the Final Rule- by virtue of its inconsistent application- fails to effectively enhance flightdeck security in the all-cargo industry.

NCA again thanks the FAA for the opportunity to provide these comments.

Respectfully submitted,

Masaharu Sakai
Managing Director & Chairman
Safety Promotion Committee
Nippon Cargo Airlines Co., Ltd.