AIR TRANSPORT ASSOCIATION

April 1, 2003

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590-0001

Attention: Rules Docket No. Docket No. FAA-2003-14193

Subject: Design Standards for Fuselage Doors on Transport Category Airplanes; Proposed Rule, re: **Transport Category Airplane Design Standards For Fuselage Doors, Hatches, and Exits,** 68 Fed. Reg., 1931, January 14, 2003

Ladies and Gentlemen:

FAA has proposed an amendment to the design standards for fuselage doors, hatches, and exits on transport category airplanes. If the proposal is adopted, the design standards of the following sections of the FAR would be revised: Sec. 25.783 - Fuselage Doors; Sec. 25.807 - Emergency Exits; Sec. 25.809 - Emergency Exit Arrangement; and Sec. 25.810 - Emergency Egress Assist Means and Escape Routes. A new section 25.820, Lavatory Doors, would be added.

FAA states that adopting the proposal would improve door integrity by providing design criteria that would ensure that doors remain secure under all circumstances that service experience has shown can occur. This action also would eliminate regulatory differences between the airworthiness standards and related guidance material of the United States, and of Europe.

Member airlines of the Air Transport Association provided the attached comments to the proposal. Members concur with the intent of the proposal, and note that it would provide the benefits of harmonized standards.

We sincerely appreciate the opportunity to contribute comments to this proposed rulemaking. We thank you for your consideration of these views.

Sincerely,

Joe White
Director, Aircraft Systems Engineering

Air Transport Association of America
1301 Pennsylvania Avenue., NW - Suite 1100 Washington, DC 20004-1707
202-626-4000

Cc: Mr. Jeff Gardlin, ANM-115, fax 425-227-1320
AEC
AIESC

Encls/

JW/03-AE-006

Alaska Airlines

February 28, 2003

Air Transport Association of America
1301 Pennsylvania Ave. NW
Suite 1100
Washington, DC 20004-1707

Attention: Mr. Joe White
Director, Aircraft Systems Engineering
202-626-4081 FAX

Subject: Transport Category Airplane Design Standards for Fuselage Doors, Hatches and Exits.

Reference: (A) Memorandum No. 03-AE-006
(B) Docket No. FAA-2003-14193

Dear Mr. White,

Alaska Airlines has reviewed the reference (A) Memorandum and (B) Docket and have the following comment. We generally agree with the proposed rulemaking that would improve door integrity and ensure that doors remain secure under all circumstances. In addition, this action will eliminate regulatory differences in airworthiness standards between the United States and Europe.

Thank you for the opportunity to provide comments and if you have any questions or need additional information, please contact me at 206-392-9745.

Sincerely,

James C. Trimberger
Director, Technical Compliance

BOX 68900 SEATTLE, WA 98168-0900/206-433-3200

AmericanAirlines®

February 26, 2003

Attn: Joe White - ATA

REF: Memo No. 2003-AE-006, Transport Category Airplane Design Standards for Fuselage Doors, Hatches, and Exits – Proposed Rule

After reviewing document 2003-AE-006 AAL finds that this document simply clarifies requirements and standards for all aircraft doors. None of the proposed provisions have any dramatic impact on Air Carriers. It removes ambiguity from FAR 25.783, clarifying paragraphs for specific doors and their manufacturing and safety requirements.

"Harmonization" of both the JAR-25 and FAR-25 makes logical sense for all aircraft since they are sold in a global market. This should help Air Carriers in the future from an operational and maintenance perspective.

In conclusion, this proposed rule would provide the following:

- Provides a slight increase in Safety
- Provides some cost savings for the manufacturer
- Improves maintenance and operations in the future for Air Carriers by providing a more common door standard

H.A. Demarest
Director, Aircraft Engineering
American Airlines

From: Teuscher, Friederich [via e-mail]
Sent: Thursday, March 20, 2003 5:20 PM
To: White, Joe
Cc: Warshauer, Edward; Moses, Joseph

Subject: ATA Memo 03-AE-006: Design Standards For Fuselage Doors, Hatches, and Exits - Proposed Rule

Joe,

CAL has no objections to the referenced rule. Since it only pertains to PART 25 new designs, it has no impact to CAL at this time.

Best Regards,

Friederich Teuscher
Structures Engineering
Continental Airlines, Inc.
713-324-8228 phone
713-324-7703 fax
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UNITED AIRLINES

Maintenance Operations

February 14, 2003

Air Transport Association of America
1301 Pennsylvania Ave., NW, Suite 1100
Washington, D.C. 20004-1707

Attention: Mr. Joe White
Director, Aircraft Systems Engineering

Subject: Design Standards for Fuselage Doors on Transport Category;
NPRM Docket No. FAA-2003-14193

Reference: ATA Memo 03-AE-002

Dear Mr. White,

The reference ATA Memo advised of and requested comments on the subject proposed rule that will revise design standards for fuselage doors. We concur with the contents of the proposed rule and have no additional comments.

Sincerely,

Larry Slate
Chief Engineer

bcc: P. Sesny, United Airlines – SFOEG

San Francisco International Airport, San Francisco, California 94128