



## AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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Federal Aviation Administration (FAA)  
U.S. Department of Transportation  
400 Seventh Street, SW  
Nassif Building, Room PL-401  
Washington, DC 20590

Subject: Docket No. FAA-2004-19017; Directorate Identifier 2004-NM-144-AD

IN PARTIAL SUPPORT

Dear Sir or Madam:

The Air Line Pilots Association, International (ALPA), representing over 64,000 cockpit crewmembers at 43 airlines in the U.S. and Canada is concerned that the mitigation proposed in the Final Rule referenced above regarding Airworthiness Directives on MD-10-10F, MD-10-30F, MD-11, MD-11F, and 717-200 Airplanes does not adequately address the problem.

ALPA supports the need to mitigate for the FMS profile mode anomalies that have been experienced. However, the AFM guidance is overly complex and as a result, likely not to be an effective mitigation. The "Alternative Methods of Compliance (AMOCs)" option is not sufficient to account for the convoluted mitigation offered by the AD.

The AD allows for continued use of the profile mode if multiple conditions are met. During already high workload descent and approach phases, expecting pilots to perform an analysis to determine if the conditions allow use of the profile descent mode creates a situation ripe for human error. Rather, the AD should provide the conditions when the FMS could descend below the desired altitude and reiterate that the airline training and pilot action should always be to monitor the FMS system and intervene when it does not properly follow the desired flight track.

Thank you for the opportunity to comment. If you have any questions please contact me at 703-689-4176.

Sincerely,

Kevin Comstock  
Staff Engineer  
Engineering & Accident Investigation

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