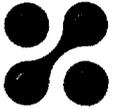


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July 10, 2002
Reply to GEN/02/020

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

Subject: Eclipse Aviation Corporation Comments to FAA Notice of Proposed Rulemaking (NPRM) on Reduced Vertical Separation Minimum (RVSM) in Domestic United States Airspace

Dear Sir,

This correspondence is in response to the subject proposed rulemaking published in the May 10, 2002 Federal Register (Volume 67, Number 91); Docket No. FAA-2002-12261; Notice No. 02-09.

Eclipse Aviation wishes to express our full agreement and complete support of the proposed rulemaking. As the FAA is fully aware, and as discussed in the proposal, air traffic is expected to increase significantly in the next ten years. This increase will require safe and efficient methods to allow operation at the fuel-efficient altitudes addressed by this Notice, or result in significant air traffic delays in the National Airspace System (NAS). Additionally, the increase in air traffic without the implementation of mitigating measures such as RVSM will limit the ability for air traffic to address issues such as directing traffic around weather patterns. Also of note is that a number of foreign airworthiness agencies, such as the JAA, are actively and aggressively pursuing RVSM to allow for more efficient use of the air traffic system. Therefore, implementation of Domestic RVSM in a timely fashion will provide enormous enhancements to the NAS. In anticipation of these needed changes in the NAS, the Eclipse Model 500, scheduled for certification in late 2003, will be equipped to operate in the RVSM environments discussed in the proposed rulemaking.

We would like to also complement the FAA on the quick action they have taken to publish this Notice, and strongly encourage the FAA to continue an aggressive implementation of Domestic RVSM. We know that some advocacy groups in industry have tried to slow down these efforts. However, we believe the possible negative impacts on the small number of owner/operators will be far out-weighted by the enhancements provided to the mass of airplanes and operators that will have increased access to this airspace. Further, as discussed earlier, many foreign authorities are aggressively pursuing RVSM. To slow down the Domestic efforts for a small minority of operators may result in a negative impact to Domestic industry.

If you have any questions, or if Eclipse Aviation can provide assistance in helping with quick implementation of this rulemaking, feel free to contact me at (505) 724-1243.



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Regards,

**Randy Griffith
Airworthiness Coordinator
Eclipse Aviation Corporation**