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29 July, 2002

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

COPY: John Hickey - Director, Aircraft Certification Service / US FAA

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DEPT. OF TRANSPORTATION

Re: Final Rule - Security Considerations for the Flight Deck on Foreign Operated
Transport Category Airplanes
Docket No. FAA-2002-12504 -9
(IATA Comments)

Dear Sir/Madame,

The International Air Transport Association (IATA) represents over 270 international air carriers that combined carry over 95% of the world's passenger and cargo traffic. IATA appreciates the opportunity to provide comments on the Final Rule that the Federal Aviation Administration (FAA) published June 21, 2002, on security considerations for the flight deck on foreign operated transport category airplanes.

IATA Member air carriers support the enhanced aircraft security measures proposed by the International Civil Aviation Organization (ICAO) and the FAA, in particular the strengthened cockpit door provisions as presented in this Final Rule. IATA has established good communications with the FAA's Aircraft Certification office and has already made its views well known on this subject.

IATA supports the deadline for compliance, established by ICAO, of 1 November 2003. IATA recognizes the threat against the US and indeed globally as was manifest in the tragic events of 11 September, 2001. However, there have been substantial delays in gaining FAA and European certification through the Joint Aviation Authorities (JAA), of the Airbus and Boeing security enhanced aircraft door kits. Due to these delays, IATA believes that compliance with the 9 April, 2003 deadline, established for Part 129 air carriers, will create a severe logistical problem for our Member air carriers.

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In order to comply with the April, 2003 deadline, and taking account of the current certification schedules as provided by Airbus and Boeing, our Member air carriers foresee the need for significant grounding of their respective fleets. The cost of downtime for the fleet, in terms of lost productivity, will significantly exceed the actual costs of purchasing and installing the door kits themselves. The need to meet such a compressed installation timetable will entail the need to make modifications outside of routine maintenance schedules, which in turn significantly magnifies the overall cost to our Member air carriers, of this Final Rule.

Of particular concern is the current Airbus proposal for wide-body aircraft, which will require 6 to 7 days of out-of-service time for installation, yet the first doors will not be available until the end of October, 2002. For those air carriers whose operations to the US are principally undertaken using Airbus aircraft, this will create an enormous operational and hence financial burden in order to get the doors installed by the published deadline date. There are also similar concerns with the Boeing 747-200 (Classic) door kits that will not be certified until December, 2002.

An additional issue of concern to our Member air carriers is that we have been advised that some of the Airbus kit proposals would require a multi-step certification with a temporary requirement for national authority exemptions from certain airworthiness requirements. The granting of such exemptions by national authorities would likely follow that of FAA and JAA. This process would take time and further compress the already tight timelines. IATA is also concerned that there may not be a streamlined and harmonized approach by all national authorities to grant these exemptions and as such the 9 April, 2003 deadline may not provide sufficient time for such exemptions to be issued on a world-wide basis.

IATA Member air carriers are doing their best to comply with the deadline for installation. IATA will continue to work with the FAA to ensure that its Member air carriers are kept regularly informed of all required security measures/directives, as well as to inform the FAA of problems that the air carriers are experiencing in meeting the various mandates.

However, we urge the FAA to seriously consider these forecasted difficulties, as advised by our Member air carriers, and consider an extension of the April, 2003 deadline. As is well known, the global airline industry is experiencing significant financial difficulties and these difficulties would be compounded by the forecast need for substantial out-of-service time for the fleets of our Member air carriers. IATA believes that the temporary "Phase 1" modifications mandated by the FAA on Part 129 air carriers, provides sufficient protection for the flight deck, to allow the FAA the flexibility to extend the 9 April, 2003 deadline to match the ICAO deadline of 1 November, 2003.

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Once again IATA thanks the FAA for the opportunity to provide comments, on behalf of our Member air carriers, on this Final Rule and looks forward to continued co-operation with the FAA on this issue.

Sincerely,



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