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BEFORE THE
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, DC

DEPT. OF TRANSPORTATION
DOCKETS

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In the Matter of)
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SECURITY CONSIDERATIONS FOR THE)
FLIGHTDECK ON FOREIGN OPERATED)
TRANSPORT CATEGORY AIRPLANES)
)
Final Rule)
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Docket No. FAA-2002-12504 - 10
Public Meeting

COMMENTS OF

THE ASSOCIATION OF ASIA PACIFIC AIRLINES

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Dated: 30 July 2002

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COMMENTS OF
THE ASSOCIATION OF ASIA PACIFIC AIRLINES

This submission by the Association of Asia Pacific Airlines (AAPA) is made on behalf of its member airlines¹ in response to the Final Rule issued by the Federal Aviation Administration (FAA) on June 21, 2002, regarding Security Considerations for the Flightdeck on Foreign Operated Transport Category Airplanes (Docket No. FAA-2002-12504). AAPA member airlines may also file comments individually. The Final Rule requires improved flightdeck security and operational and procedural changes to prevent unauthorized access to the flightdeck on passenger-carrying aircraft and some cargo aircraft operated by foreign carriers under the provisions of 14 CFR Part 129.

Thank you for the opportunity to provide a statement today on behalf of the AAPA member airlines. The AAPA is a trade organization representing the common interests of 17 major Asia Pacific airlines. Thirteen of those airlines currently operate to the U.S.

¹ AAPA members include Air New Zealand, All Nippon Airways, Asiana Airlines, Cathay Pacific Airways, China Airlines, EVA Airways, Dragonair, Garuda Indonesia, Japan Airlines, Korean Air, Malaysia Airlines, Philippine Airlines, Qantas Airways, Royal Brunei Airlines, Singapore Airlines, Thai Airways International, and Vietnam Airlines.

As you know we have several member airlines represented here today, and some of them will also be providing a statement. The AAPA will also be providing collective written comments to the docket in accordance with the Final Rule, and several members will also be submitting individual written comments.

The AAPA wants to make it clear, especially in light of the events of September 11, 2001, that it supports and understands the need to protect persons and property from terrorism. The AAPA is committed to working with the United States and its various responsible government agencies, including the FAA, in this regard. And, the AAPA member airlines operating to the U.S. are working very hard to meet the April 9, 2003, compliance date as required by the Final Rule, and intend to do so if possible.

To put some perspective on our size and the impact of the Final Rule, our 17 members operate over 20 percent of the global A-330 and A-340 fleet, and almost one-third of the B-747 and B-777 fleet. We have estimated, based on member and manufacturers inputs and costing data, that to modify the entire AAPA fleet by April 9, 2003, will cost over USD\$30 million. If airplanes cannot be modified by that date, and therefore will not be allowed to fly, the cost to that carrier for that aircraft is estimated to be USD\$350 thousand per day.

Our member airlines are safety and compliance oriented, and recognize the need for increased cockpit security. For example, those members operating to the U.S., and several other members, have already complied with the phase 1 requirements. In fact, several AAPA members voluntarily initiated action shortly after September 11 to increase cockpit security. This was before the FAA or AAPA members' own civil aviation authorities took action.

In some cases, however AAPA member airlines are encountering difficulties. A majority of the concerns regard late certifications of the amended or supplemental type certificates by the FAA and the associated possibility of delays in receiving the modified door kits from the vendors. Others have to do with the relatively low priority the older

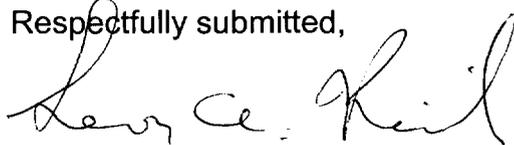
models, such as the B-747/100 and B-747/200 have in the certification and manufacturing process as well as late kit deliveries. Other concerns have been expressed by operators with all cargo aircraft with the suggestion that operational and security measures be considered as equivalent measures to strengthened doors.

We will of course provide more data in our written comments, and I am sure you will be hearing directly from the affected members.

In closing, the main message I am hearing from AAPA members is that maximum support from the FAA is required to insure prompt certifications and kit deliveries, and, while they are intending to comply, if an airline has taken reasonable steps to comply but are constrained by the approval or hardware delivery process, they should be given limited exemptions as appropriate.

Thank you again for the opportunity to make this brief statement, and I would be happy to answer any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leroy Keith". The signature is written in a cursive, flowing style.

Leroy Keith
Technical Director
Association of Asia Pacific Airlines