

**STATEMENT OF JAPAN AIRLINES
REGARDING FAA FLIGHTDECK SECURITY RULE**

FAA Public Meeting, July 30, 2002

My name is Kozo Hama; I am Manager of the Engineering Project Office in Japan Airlines' Engineering Department. I would like to thank the FAA for holding this public meeting and for the opportunity to present our views on the June 21 final rule regarding flightdeck reinforcement on aircraft operated by non-US airlines to/from or over the United States.

These comments cover not only Japan Airlines but also its subsidiary JALways, which also serves the US. Together, there are about 100 JAL and JALways Boeing aircraft that are affected by the FAA rule. This is therefore a very important subject for us.

The FAA final rule requires that foreign airlines must install new flightdeck doors on aircraft serving the United States by April 9, 2003 and also install temporary locking devices by August 20, 2002. For your information, JAL already meets the latter requirement since temporary locking devices were installed in November of last year on all JAL Group aircraft. Although we intend to file written comments to the final rule on August 20, we would like to summarize here our current and somewhat urgent concerns regarding timely compliance with the fortified cockpit-door requirements.

JAL would like to make it very clear that it is in complete agreement with the SFAR 92 standards and with the goals of the FAA rule. JAL will employ all resources that are necessary and within its control to comply on a timely basis. The highest degree of

cockpit security is also what my own government, through the Japan Civil Aviation Bureau, expects.

However, I have made this long trip from Tokyo to emphasize that -- for reasons outside the control of JAL -- completion of the modifications on all the affected Boeing 747-100/200 models by April 9, 2003 may not occur on time. As things now stand, we currently forecast a completion date of April 30, 2003 for these aircraft. The reason for this forecast is a delay in the kit delivery from Boeing.

According to recent information from Boeing, the 747-100/200 models require many more elapsed hours and a much longer lead time for kit development and delivery than Boeing initially indicated because not only the flightdeck door but also the surrounding structures need to be modified in order to meet the FAA requirement. The kit delivery is scheduled in mid-January 2003. Even if this kit delivery schedule is met, the fact that we are operating fifteen 747-100/200 airplanes that need to be modified will lead to an inability to complete the retrofit by the due date. Our current estimate is that a few aircraft will be left undone, and we will not be able to serve the US with them as of April 9, 2003. This would have a serious impact on our business.

We considered other options such as selecting suppliers other than Boeing. However, due to the complexity of the design and certification requirements, we believe that the original manufacturer, Boeing, is the fastest, and indeed the sole, solution to obtain the doors for the 747-100/200 models.

In the meantime, according to Boeing and the other vendors, design approval from FAA for other aircraft models is likely to take longer than expected. Delayed or

failed design approval could also hinder completion of the retrofit for such models beyond the due date.

Given the huge task of providing FAA-certified retrofit solutions to a great many of the Part 121 carriers, JAL thinks that it is questionable whether Boeing -- despite its best efforts -- has the resources to support all the retrofits FAA has recently also required of Part 129 carriers within the same timeframe. Further, the FAA itself has a critical role to play in connection with the design approval process and coordination with the manufacturers. Delay problems that are sourced at Boeing or the FAA -- or both -- are clearly beyond JAL's control. If JAL does its part by using its best efforts to comply with the April 9, 2003 date, it should not have to suffer any adverse consequences from a delay that it cannot control. For the FAA to do otherwise would impose unreasonable regulation on foreign airlines.

Any realistic chance for many Part 129 carriers, including JAL, to meet the current deadline will require a greater sense of expedition than appears to be the case at this time. In order to provide a greater sense of expedition, we strongly and respectfully request that the FAA --

- consider all practicable solutions, such as accelerated design approval and certification processes;
- consider governmental support for Boeing and other door manufacturers to allow them to expedite kit delivery for the affected aircraft, especially Boeing 747-100/200 model operated by FAR129 operators; and
- treat FAR 121 & 129 operators fairly in terms of design approval and kit delivery timing.

As stated at the outset, JAL is willing and anxious to meet the due date for cockpit door fortification. But current indications are that slippage in the date for some JAL aircraft will not be the fault of JAL. Sanctions against JAL for such slippage would be unjust. The simple answer is to avoid any slippage through an earlier delivery of the Boeing kits and expedited FAA processes.

I again thank you for the opportunity to present JAL's views.

Japan Airlines