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Département Qualité Contrôle

Docket management system
US department of transportation
Room Plaza 401,
400 Seventh street, SW
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USA

DQC N° 089/02
FBD
DOCKET NUMBER FAA-2002-12504

SUBJECT : Docket No FAA-2002-12504 Amendment No 129-33
Security considerations for the flight deck on foreign operated transport category airplanes

Gentlemen

It is an honor to submit our remarks concerning the above amendment to the FAR Part 129.

1. Introduction

Dassault Falcon Service (DFS) is a 100% subsidiary of Dassault Aviation, Original Manufacturer of the Falcon series transport airplanes. Those airplanes are 19 passenger seats maximum and are used for operation on demand or commuting. Never or very seldom for scheduled airlines purposes. Those airplanes have no door between the flightdeck and the passenger cabin.

DFS operates on demand flights from Le Bourget (France) through its JAR OPS 1 certified air transport company.

2. Comments on proposed amendment to FAR 129

The proposed amendment would require all foreign air carrier to install a door between the flightdeck and the passenger cabin.

The intent of this proposed amendment is to obtain flight deck security measures commensurate with those of the FAR Part 121 US carriers.

European air carriers are operating under JAR OPS 1 and the JAR OPS 1 does not make the difference between scheduled airlines companies and operation on demand companies as do FAR part 121 and FAR part 135.

Then the European companies operating the very same aircraft model for the very same business as their US counterparts under FAR Part 135 regulation would have different requirements : The European company



company would not be required to. This would place on the JAR OPS 1 companies making only on demand or commuting air transport an unfair burden.

3. Proposal

DFS respectfully requests to the FAA to change to the proposed § 129.28 as follows :

§ 129.28 Flightdeck security :

(a) After August 20, 2002, no foreign air carrier covered by § 129.1(a) except those for commuter and on demand operations only may operate :

(1) A passenger carrying transport category aircraft within the United States

We remain at your disposal for any further information you may need and are respectfully yours.

A handwritten signature in black ink, appearing to read "François BAUDOIN".

François BAUDOIN

Quality Director

Copie :

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