



**NATIONAL
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**BEFORE THE
U. S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION**

Security Considerations for the)
Flightdeck on Foreign Operated)
Transport Category Airplanes)

**Docket FAA-2002-12504; Amendment
129-33**

**COMMENT OF THE
NATIONAL BUSINESS AVIATION ASSOCIATION, INC.**

NBAA and its Member Companies recognize and appreciate the need for security enhancements within our aviation system. However, it is imperative that, as rules are developed, the affected community be engaged as a partner in solving our aviation security challenges.

NBAA believes the final rule issued by the Federal Aviation Administration (FAA) is intended to regulate part 121 equivalent foreign carriers as defined in part 129. In the background to the rule, it is stated that:

“ . . . part 129 is effectively equivalent to part 121 in terms of the types of operations conducted and the aircraft used”

However, the rule as written regulates operations beyond the scope of those that are equivalent to part 121. In order to accomplish the intent of the rule, it is recommended that the following revised wording be incorporated:

“The following aircraft operated under Part 129 are exempt from the requirements of 129.28-Flightdeck security:
aircraft with a maximum seating capacity of 19 or less”

Respectfully submitted,

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