

REF: GMET.009/02

20<sup>th</sup> August, 2002

Federal Aviation Administration

### **Comments of Final Rule regarding improved Flightdeck Security**

This submission by Cathay Pacific Airways is made 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).

#### **I. Background**

Cathay Pacific Airways is a member of the Association of Asia Pacific Airlines (AAPA) with a fleet size of 77 aircraft comprising 30 B747s, 12 B777s, 15 A340s and 20 A330s. We operate several daily passenger and cargo freights to the U.S.

Cathay Pacific Airways fully supports the need to protect our passengers and crews against the threat of terrorism. In light of the events of September 11, Cathay is committed to working with the FAA and our local airworthiness authority HKCAD to strengthen Flightdeck security.

#### **II. Current Status**

Since the initial issue of the SFAR92-1 late last year, Cathay has set up an internal task force to monitor regulatory requirements and developments in the marketplace of flightdeck security enhancements.

All of our aircraft have been modified to comply with phase 1 of SFAR 92-1.

For phase 2 or final rule compliance, Cathay have selected a Non-OEM supplier to provide the STC modification kit with the aim of 1<sup>st</sup> shipset delivery later this year.

#### **III. Challenges**

To complete the required modifications by April 9, 2003, detail aircraft down time and manpower planning is required in order to meet the programme requirements whilst minimising operational disruption. The latest information received from our third party supplier is that STC application processing by the FAA is now on the critical path and approval of the phase 2 modification will take significantly longer (up to 3 months) than normal STC application. This will result in delay to the modification kit and Service Bulletin delivery and severely compromise our ability to meet the required modification timeframe.

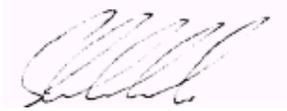
#### **IV. Conclusion.**

While Cathay Pacific Airways is fully committed to working with the FAA and the U.S. Government for final rule compliance and every effort is being made to achieve this goal, any delay introduced by the FAA into the STC process is beyond our control.

We therefore respectfully request the FAA make available sufficient resources such that the same urgency can be applied to third party STC applications as is being applied to the Boeing or Airbus modifications.

Furthermore it is requested that the FAA acknowledge the significant efforts being made on the part of the airlines in committing to these programmes. In the event of delays caused by issues beyond the airlines control the FAA should consider granting Cathay limited exemptions from the April 9, 2003 threshold.

Yours faithfully,  
for **Cathay Pacific Airways Ltd.**

A handwritten signature in black ink, appearing to read 'S. Chadwick', is enclosed in a light pink rectangular box.

Steve Chadwick  
General Manager Engineering Technical

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