

to: FAA-2002ACE-01-CS, cc to: FAA 2002-11032, FAA-2001-10770,
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This message is to convey my comments regarding my observations and knowledge as an industry participant to the subject Docket matter and copied to related dockets and other affected persons. Although my comments are based on my twenty-plus years in the regional airline industry, these comments provided here are my own and are not presented as those of any past or present employer.

Whereas when the subject solicitation was issued I was not optimistic that an economical solution could be found for the matter of flightdeck security for 19-passenger airliners operated in part 121/129 service, I am now quite confident that such a solution can be found and would be economically-feasible for many of these airliners. My conclusion that such a modification is based on the availability of funding for this group of airplanes for voluntary modifications made with reimbursement provided for by FAA as announced at http://www2.airweb.faa.gov/airplane_security/announce.htm

The technical approach that I am aware of may be funded by FAA thru the 'Pilot Program' in which testing and simulation to accomplished to date appears to offer the credible potential for a flexible barrier, constructed and installed between cabin and flightdeck, providing ballistic and blunt force protection emulating the part 25 and part 121 standards resulting from the final rules at docket 11032. Further, the design is anticipated to incorporate a crew rescue feature -- operable only when the aircraft is on the ground -- which would permit prompt access to disabled pilots unable themselves to open the barrier. Further, the modifications are intended to incorporate 'passive cabin viewing' capability to the pilots providing awareness of cabin activities without vulnerability to threats therefrom.

At present, the only obstacle to full exploration and possible exploitation of this potential is to effect a workable agreement between FAA contracts personnel and an airline appropriate to the application to these airplanes. This will require modification of the standard FAA agreement language appropriate to large, transport-category airliners so as to accomodate the application of these funds to non-transport category airliners for which there is no present regulatory requirement but to which the funding is clearly applicable. If present FAA funding administrative obstacles can be removed, this commenter is confident that many -- perhaps even most -- of these airliners can be provided with a secure flightdeck at no cost to the operators.

This commenter has personally notified the 14 operators of 19-passenger airliners known to me advising them of the 01september2002 deadline for application and I believe that many may choose to opt into such funding. While I do not conclude that rulemaking is essential for this class of airliners (and I personally believe that it would be of limited utility for operations entirely within the state of Alaska or offshore US territories), I do believe that it offers much by way of safety in securing the flighdeck. Here is why.

I am aware of the behavior and the statements of passengers in real events in which the vigilance and/or observations by a passenger of a real and serious safety concern were over-ridden by the consideration that merely approaching the flightdeck might be viewed by the crew and/or other passengers as a potentially hostile act and might result in a distracting or even inherently hazardous brawl as other passenger tried to intercept the passenger approaching the flightdeck not knowing the intent. Even an alternative can be foiled if verbally notifying the other passengers as to the intention to approach the flightdeck and the

stated reasons for doing so might genuinely and unnecessarily frighten the other passengers and result in greater panic.

I urge FAA to work with all willing operators of 19-passenger airliners to provide the highest level of safety in the public interest. This can be done by facilitating agreements and funding and technical coordination to determine by field testing the feasibility of such a barrier with a willing airline working with a willing and capable vendor; then, assuming a positive outcome from the evaluation, working, again, with all willing operators to implement such modifications.

Doug Myers