

186881

TIMOTHY M FISH

Chief Engineer Springhill Suites
4385 Southside Blvd
Jacksonville, FL 32216
Phone: (904) 997-6650
Fax: (904) 997-6610

10010 Skinner Lake Drive
Apartment 1424
Jacksonville, FL 32246
(904) 998-7312
fishti@erau.edu

FAA-2002-12261-75

Docket Management System
US Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590-0001

8 August 2002

Re: Docket No. 12261

DEPT. OF TRANSPORTATION
02 SEP - 6 AM 11: 27

1. The following are recommended changes to the proposal of RVSM between flight level 290 and flight level 410 in the contiguous 48 states:
 - a. §91.159 - Should state deliberately all flights above flight level 180 shall be IFR.
 - b. §91.180 - Include a sentence depicting areas of exclusion or inclusion as it may, such as "To only be implemented in areas directly over Class D (Delta), E (Echo) and G (Gulf) Airspaces" to eliminate heavy congestion directly over the country's largest airports.
 - i. Include a sentence discouraging the implementation of DRVSM in case of sudden, unexpected or severe weather or turbulence.
 - c. §91.706 - Include a clause requiring all aircraft to pass an extensive annual or biannual Mechanical Standards Test (MST) similar to the one required in by JAA in Europe to be allowed to participate in the DRVSM above FL 290. Attached to the last statement also require flight crew members of the aircrafts in question and all Flight Service Station controllers using the new regulation to pass an annual or biannual Flight Safety Test (FST). Both of these tests should be administered by an FAA examiner and will ensure the airmen, aircraft and controllers above FL 290 will be safe to implement DRVSM.
 - i. As part of the MST include a determination of potential intense wake turbulence and its effect on other aircraft flying below it. Also include a thorough instrument check-up to ensure all flight instruments are within designated parameters.
 - ii. As part of the FST include an exam encompassing safety procedures for the aircraft in question at the proposed altitude. Also, instruct all personnel to beware of any updated limitations to flight mobility in designated areas such as changing of Airspace Class.
2. I greatly appreciate the opportunity to participate in the rule-making process, and would be pleased to answer any questions or help resolve any issues in regard to my recommendations.

Sincerely,



Timothy M Fish