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FAA-2002-12461

Secretary Norman Y. Mineta
Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh St., S.W.
Washington, D.C. 20590-0001

Secretary Mineta:

As a private pilot, I take great interest in the services that the FAA provides in promoting both safety and aviation activities. I am writing to express my concerns with the proposed rule on the use of Flight Simulation Devices(FSDs) by the addition of 14 C.F.R. Part 60.

I generally agree with the FAA's findings in that promotion of FSD usage would promote safety especially in conjunction with the proposed usage of a Quality Assurance Program. However, no statistics were used in the proposed rule to suggest that use of simulator training has reduced aviation accidents or reduced the number of incidents. NTSB investigations and FAA aircrew training records could be used to show the effectiveness of a flight simulation device compared to aircrew members involved in accidents that haven't undergone any or limited simulation training. Such factors may draw support from the airlines if it could be shown that simulation training effectively reduces accidents. Insurance companies could become involved in offering reduced rates for those air carriers that utilize such FSDs.

My other concern was regarding the profitability that may be reduced by flight operations utilizing the Level A simulators. Even though the technology is outdated, the estimated remaining useful life of Level A simulators still in use is between five and eight years. The FAA's finding was that such simulators had been "fully depreciated and that their original costs recovered." What isn't addressed in the FAA's finding is that such Level A simulators may still be generating revenue for smaller flight training facilities since the training qualifies for training purposes albeit doesn't include the landing phase of the flight envelope. The two year compliance period may still leave owners and operator's of such devices short of an income producing opportunity by three to six years if use of such devices is diminished since it will no longer qualify as certified training. Even though maintenance costs for Level A simulators is higher, a study should be conducted to discover if Level A simulators would be profitable for the remainder of their useful life.

I fully support the use of the proposed Quality Assurance program to maintain the highest standards of safety. Implementing any program cannot be effective without a means to follow through and method of providing feedback. One option that I may think would be beneficial would be the creation of a network of simulator operators that could share information without the fear of reprisal from the FAA. If operators could share information freely with other operators without jeopardizing their licenses or certificates as applicable, this may further prevent mishap and improve the QA mission. I don't know if this would be applicable to use of simulators but if airliners were allowed to share mistakes of flightcrews in a confidential manner without fear of reprimand from the FAA, the sharing of such information may benefit the entire aviation industry while improving overall safety as such incidents are made known.

I look forward to following new developments with the use of simulators and believe that as newer technology becomes available, simulators will be the means of safer skies.

Respectfully,

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