

The link between flight attendants and passengers safely evacuated seems very tenuous at best and, to me, doesn't justify the proposed rule. To spend almost \$300 million dollars, or more than half the estimated costs, to upgrade approximately 2% of the overall seats (the flight attendant seats) doesn't seem cost effective at all when the FAA cannot predict with any accuracy whether the approximately five additional flight attendants statistically surviving future impact-survivable air crashes due to the new 16g seats would actually result in more passengers being safely evacuated. It makes more fiscal sense to limit the proposed seat replacement requirements to: 1) all newly manufactured aircraft are to have the new 16g seats; 2) replace on existing aircraft where the seats have to be replaced as part of a regular maintenance program (passenger and/or flight attendant seats but not both at the same time if their service life still has yet to expire); and 3) flight attendant seats that have to be replaced because they are broken. If a seat doesn't have to be replaced for the remaining life of the aircraft (excluding maintenance or normal wear and tear), then air carriers should not be forced to replace those seats. I'm completely for requiring new seats to meet the 16g requirement, but forcing air carriers to replace still functional seats according to an arbitrary timeframe just increases the costs for everyone for what appears to be a limited overall benefit to society.

Also, no matter how much force these new seats can take, it is all worthless for infants, who are not required to be strapped to seats and can be held in their parents' or caregivers' arms during an entire flight. The seats will stay in place, but the infants will sail out of the arms of the persons holding them. How many infants not strapped to a seat in a proper infant carrier have survived an impact-survivable crash? I would be willing to bet the answer is zero. I think government needs to do a better job at analyzing the overall societal costs and benefits of expenditures. Executive Order 12866 requires a cost-benefit analysis for all proposed rules to justify the proposed costs. I think that is a very worthwhile directive, however it's confined to the narrow focus of the proposed rule. We live in a society of limited resources. A dollar spent in one place cannot be spent somewhere else. I think we need to ask the overall question of whether this money can be better spent somewhere else so that we get "more bang for the buck." (eg. Why not spend the extra millions on childhood vaccinations or gunlocks. The total numbers saved from deaths or debilitating illnesses and injuries would far exceed what 16g seats could ever do.) This appears to be a rule that the FAA thinks is a good idea, and the agency is trying to justify it with some fuzzy logic and analysis. This rule should be implemented with an effort to keep the overall costs to an absolute minimum.

Since my comment about infants falls outside this proposed rule, I propose that the FAA should promulgate another rule to force air carriers to require infants to be secured to passenger seats. As a society, we recognize that need for infants and children traveling in automobiles around the neighborhood but refuse to require similar safety standards when they travel 6 miles in the sky at 500 miles per hour.