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# FlightSafety international

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**Elmer G. Gleske**  
Vice President  
Governmental Affairs

November 8, 2002

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

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Reference: Docket Number FAA-2002-12462; Notice NO 02-21 - 10  
Notice of Proposed Rulemaking (NPRM):  
*Flight Simulation Device Initial and Continuing Qualification and Use*

Ladies and Gentlemen:

This is a request to extend the comment period from December 24, 2002 to March 31, 2003.

The NPRM is a wide-ranging, intricate document that proposes to revise 14 CFR Parts 1, 60, 61, 63, 141, and 142. It also calls for the establishment of a Quality Assurance program that must meet extensive prescribed requirements. A thorough analysis of this document demands a study of personnel requirements and an assessment of the economic impact to comply with the proposed rule.

After an initial review of the NPRM, some of the proposed changes affect the business of training that could have safety implications. More than 90 days are needed to thoroughly understand the impact the proposed changes will cause on the conduct of training and the procedures used to qualify and maintain simulators and to be in a position to offer suggestions. Therefore we are proposing a new deadline of March 31, 2003.

Thank you for your consideration.

Sincerely,



Elmer G. Gleske

Cc: Mr. James Ballough, Director  
Flight Standards Service, AFS-1  
Mr. Anthony F. Fazio, Director  
Office of Rulemaking, ARM-1