

46581

Nov. 5, 1998

US DOT Dockets
Docket #FAA-I 998-4553-a
400 Seventh St, SW, Room Plaza 401
Wash. DC 20590

DEPT. OF TRANSPORTATION
DOCKET SECTION
98 NOV 10 AM 11:15

Sirs:

I am in agreement with the proposal. My qualifications to substantiate the following comments are based on 1) a CFII, ATP, dispatcher & ATC certificate; 2) owner of an FAA approved dispatcher training program; 3) an FAA examiner; & 4) employed by a Part 121 air carrier in the training department responsible for pilot & dispatcher training.

Reference 65.57, I disagree with excluding ATP rated pilots on p. 55923 regardless of which regulation they are currently operating. My experience with this group of individuals is that they are much more qualified in the areas of dispatcher knowledge currently required or proposed than air traffic controllers.

Furthermore, an ATP rated general aviation pilot is just as knowledgeable regarding weather, ATC, etc. as a military pilot, & in fact, is much more knowledgeable regarding FARs. I would not discriminate between military experience (no FAA ATP certificate) and civilian ATP experience.

I would also suggest that foreign air carrier pilots operating under Part 129 meet the minimum requirements for consideration of substitution of experience. They are required to be dispatched by a licensed US dispatcher to or from the United States.

Currently any ATP rated pilot can request a dispatcher checkride from a FAA FSDO office with having passed the knowledge exam by simply recommending himself. I see no reason to change this procedure. These professionals have consistently demonstrated the required knowledge and ability to pass the Practical Exam by self-study. I have not heard of one failure in this regard in the years I have been associated with training.

Reference Appendix A, VIII. Practical Dispatch Applications., B. Applied Dispatching: I suggest that Computerized Flight Plan training be specifically included. Several of the schools currently do not teach this. There is over-emphasis on manual flight plans. The approved schools should be required to invest in computers for the students to better prepare them for the real world.

Sincerely,



Danny Mortensen
President
Airline Ground Schools
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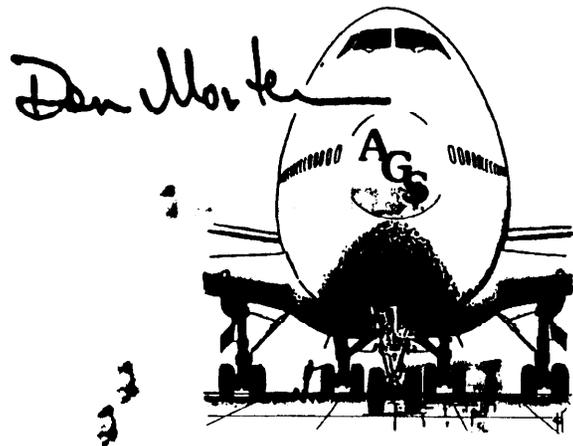


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