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Subject: IBT 10-23-98 comments on docket #FAA-98-29318

OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

DEPT. OF TRANSPORTATION
DOCKET SECTION

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Dear Sirs:

The comments of the Teamsters Airline Division on this subject are contained below.

October 23, 1998

U.S. Department of Transportation (DOT) Dockets
400 Seventh St., SW, Room Plaza 401
Washington, DC 20590

re: Docket No. FAA-98-29318

Dear Sir:

1. Submission. Below are the comments of the Teamsters Airline Division, **IBT**, on Prohibition on the Transportation of Devices Designed as Chemical Oxygen Generators as Cargo in Aircraft.
2. Member airline cockpit groups of the IBT. The Airline Division represents more than 6,000 flight deck crewmembers working 18 air carriers. Two-thirds of these carriers operate to foreign destinations.
3. Limitations of Transport of Oxygen Containers on Passenger and All-cargo Operations. The FAA proposes to ban the transport of chemical oxygen generators on all domestic passenger operations under parts 91, 121, 125, and 135 and on all domestic all-cargo operations under parts 91, 121, 125, and 135, the latter ban having some exceptions. The National Transportation Safety Board (NTSB) on May 31, 1996 recommended as urgent (Class I) that transportation of such devices be permanently banned on any passenger or cargo aircraft when the generators had passed their expiration dates and the chemical core had not been depleted. The FAA notes the accessibility to the fire that a cargo crew may have. The FAA does not comment on the inherent danger of having a crewmember of a two-man crew leave the flight deck to fight a fire. Neither does it suggest how a crewmember can fight an oxygen fed fire, once identified. Most urgent is an immediate landing. Over water, international operations for passenger and cargo aircraft are not discussed. In such operations, the crew likely would have no opportunity to land.
4. Potential of Human Error. The FAA discusses at length the potential for human error when handling and loading oxygen generators. It suggests that the all-cargo crew is better equipped to handle such an emergency and there is not the added risk of passenger deaths due to less capable oxygen equipment, as compared to the flight deck crew. Although such suppositions are not wholly inaccurate, the all-cargo crew's advantage is marginal at best. We believe the hazard to all-cargo crews is understated and the **FAA's** recommendation on such crews is inconsistent with the evidence they review.
5. Recommendation. The Teamsters Airline Division, IBT, concurs with the recommendation to ban carriage on all passenger flights. The IBT does not concur with the FAA's stated intent to make exceptions in order to carry certain categories of oxygen generators on domestic all-cargo aircraft. The IBT also believes that such carriage should be banned on international

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