



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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DUPLICATE SECTION

February 26, 1999

FAA-1998-4553 -6

51895
Federal Aviation Administration
Office of the Chief Counsel
Attn: Rules Docket (ACG-200)
Docket No. 98-14
800 Independence Avenue, S. W.
Washington, DC 2059 1

Subject: NPRM 98-14, Revision of Certification Requirements for Aircraft Dispatchers

Ladies and Gentlemen:

The Air Line Pilots Association, representing the safety interests of 5 1,000 pilots flying for 5 1 airlines, has reviewed the subject Notice of Proposed Rulemaking.

We think that this is an excellent document and concur with it as written.

We do have one general comment. The proposed FAR6561 (a) (2) requires "a minimum of 200 total course hours." We were not sure if this means "classroom hours" or could include other "hours" such as "Computer Based Training (CBT)." We assume that the FAA would want to allow for modem teaching techniques like CBT. You may want to **consider** including a further explanation as to what constitutes "total course hours."

Thank you for the opportunity to comment.

Sincerely,

John O'Brien, Director
Engineering & Air Safety Department

JO'B:amr

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