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DEPARTMENT OF TRANSPORTATION

OFFICE OF THE
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RULES DOCKET

Pratt & Whitney
A United Technologies Company

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DOCKET SECTION

Federal Aviation Administration
Office of the Chief Counsel
800 Independence Avenue, SW.
Washington, DC 20591

FAA-98-4815-3

Attention: Rules Docket (AGC-200), Docket No. FAA-1998-4815, Room 915G.

Subject: Comments to the Docket NPRM 33.76 Bird Rule

Comment to the docket

P&W supports the need for increased requirements in the rule regarding the increase from a 1.5 lb flocking bird design requirement to a 2.5 lb requirement which addresses the herring gull threat. This increased requirement taken together with a requirement to demonstrate minimal "safe" damage under the ingestion of a 8 lb bird similar to the **canada** goose, provides a significant improvement in **flight** safety over the current regulatory requirements.

We do not feel that it is practical nor required to devise additional test or demonstration requirements to **address** all possible combinations of bird sizes and quantities in combination with minor variations in engine design practices. The data is clear, that the historical threat will be substantially mitigated by the adoption of this rule. For unique engine design features, the FAA has the option of proposing Special Conditions using existing procedures.

We strongly support the issue raised in the assumptions to the basis of this rule regarding current standards of airport certification and, that governmental agencies must take steps to prevent the increase of large flocking birds on airport property.

Regards.



John S Thackrah
Vice President Programs



Alan T Weaver
Sr Fellow, Airworthiness