



DEPARTMENT OF TRANSPORTATION

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DOCKET SECTION

53164

Federal Aviation Administration
Office of the Chief Counsel,
Attention: Rules Docket

(AGC-200 . Docket Number FAA- 1998-4758 -34
800 Independence Avenue, S.W.,
Washington DC 2059 1

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OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

Dear Sirs,

SUBJECT: COMMENTS ON FAA's NOTICE OF PROPOSED RULE MAKING (NPRM)

Ethiopian Airlines, through its delegate, attended on February 24, 1999 the public meeting on the NPRM held by the FAA. You will note from the records of the proceedings that in variably all carriers, airport organizations and government representatives unanimously objected to the proposed implementation of the proposed rule on the grounds that it is contrary to the Chicago convention, impugns states' sovereignty rights and as a practical matter, is unnecessary, unworkable and cannot be administered on a cost effective basis. ETHIOPIAN as a signatory of this convention, fully subscribes to this objection.

Historically, there is no evidence to indicate that the same security threats that apply to the U.S. carriers apply to foreign carriers serving the U.S. However, the NPRM ignores the generally accepted principle that the degree of security required should be commensurate to the threat posed.

The security measures required by the NPRM also are counterproductive and impose substantial costs on airlines and their respective governments. Under this rule, the last departure airports

of ETHIOPIAN flights to the U.S. will be forced to use existing concourse capacity to provide additional space for profiling and screening as well as facilities for departure gate search.

Further, the proposed rule making will result in loss of slot and capacity since the implementation of the rule making will impose increased minimum connecting times for airlines.

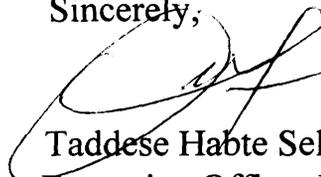
President Clinton's "safe skies for Africa" initiative provides a unique window of opportunity to mobilise the significant political will and financial resources required to properly address some of the pressing challenges facing the African aviation industry. ETHIOPIAN whose long time commitment to the promotion and development of commercial aviation within Africa and between Africa and the U.S. and the rest of the world has relentlessly endeavoured to achieve safe operation. This has earned the Airline category I for its operation to the U.S.

We feel the introduction of the proposed rule making will interfere and stifle the good cause of the president.

In general, the proposed rule making will damage international co-operation and encourage unilateral action.

We, therefore, propose the withdrawal of the rule making and reinstatement of the common approaches to establishing uniform security regulations.

Sincerely,



Taddese Habte Selassie
Executive Officer Human
Resources Management