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ORIGINAL

Maintenance Operations

August 25, 1999

US Department of Transportation Dockets,
Docket No. Docket No. [FAA-1999-59251 - 6]
400 Seventh Street, SW., Room Plaza 401
Washington, DC
20590

DEPT. OF TRANSPORTATION
99 AUG 31 PM 12: 04

Attention: Mr. Art Coulomb
Director, Maintenance & Materiel

Subject: Reduced Vertical Separation Minimum
NPRM Docket No. FAA-1999-5925

Dear Art,

United Airlines has no technical objections to this NPRM. With regard to aircraft utilized within the Pacific oceanic airspace, United's B747-400, B767-222 ETOPS, B767-322 and B777 fleets are currently qualified for RVSM. Additionally, we are qualifying our B757-ETOPS, DC10-30 and B747-238 fleets. We anticipate no difficulties in obtaining this qualification prior to the deadline of February 24, 2000.

We also understand the need for maintaining precise altitude accuracy for aircraft utilizing this airspace and support the need for initial monitoring of height on two aircraft per fleet type. However, we do object to the potential requirement to utilize Global Positioning Monitoring Systems (GMS) units onboard all RVSM aircraft to satisfy long term monitoring requirements.

It is known that airframes do not change significantly over time and tend to maintain very consistent height keeping. A maintenance program which periodically checks height accuracy and skin waviness coupled with a detailed training program should satisfy longer term requirements for height monitoring.

Sincerely,


J. M. Gay
Chief Engineer & Director,
Aircraft Engineering

cc: C. Satterlee, United Airlines, SFOEG