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**Air
Traffic
Control
Association, Inc.**

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DOCKET SECTION

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September 20, 1999

Department of Transportation Dockets
Docket No. FAA-1999-6001 -15
400 Seventh Street
Room Plaza 401
Washington, DC 20590

Re: 14 CFR Part 193 [Docket No. FAA-1999-6001; Notice No.99-14] Protection
of Voluntarily Submitted Information

The Air Traffic Control Association (ATCA) supports the intent of this proposed rule. The rule will serve to enhance the analysis of real time operational safety data and enhance safety in the National Airspace System. The Association believes safety programs such as FOQA and ASAP which would be made available to all members of industry and participated in by the FAA, should be designated national programs. This would encourage industry and employee participation and support through the designation of the related safety data as protected under the provisions of 14 CFR Part 193.

ATCA is concerned that the unrestricted access by other than aviation safety experts, to aviation safety related information, presents deterrents to increased aviation safety. First, those who might be willing to share information are reluctant to do so because of possible misinterpretation by those who not have the requisite technical background. Equally important is what the FAA will do with the data in conducting enforcement activities. For adequate protection, the FAR preventing misuse of FOQA and ASAP data must also be enacted.

In conclusion, the Air Traffic Control Association supports the intent of this proposed rule and believes when the above mentioned and other associated issues are resolved safety enhancements to the National Airspace System will rapidly occur.

Sincerely,

Gabriel A. Hartl
President

