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AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

535 HERNDON PARKWAY □ P.O. BOX 1169 □ HERNDON, VIRGINIA 20172-1169 □ 703-689-2270
FAX 703-689-4370

December 20, 1999

U.S. Department of Transportation Dockets
Docket No. [FAA- 1999-6482] - 9
400 Seventh Street SW.
Room Plaza 401
Washington, DC 20590

99 DEC 22 PM 3:14
DEPT OF TRANSPORTATION
DOCKETS

IN SUPPORT

Dear Sir or Madam:

The Air Line Pilots Association, representing the safety interests of 53,000 professional airline pilots flying for 52 airlines in the United States and Canada, has reviewed the referenced notice of proposed rulemaking (NPRM). We support the measures outlined. The NPRM proposes to amend the digital flight data recorder (DFDR) regulations for transport category airplanes to add a requirement for all Boeing 737 (B-737) series airplanes to record additional flight data parameters.

We understand this action is based on a need for additional parameters to be recorded which would provide the only currently available means of gathering information that the FAA and the NTSB anticipate will help assess the reasons for continuing incidents that appear related to rudder anomalies on B-737 airplanes. We also understand the FAA is proposing a change to the flight data recorder requirements of part 125 that would affect all aircraft operated under that part or under deviation from that part.

We agree that a potentially unsafe condition has been identified and concur with the FAA proposed amendment to 14 CFR Parts 91, 121, and 125.

Thank you for the opportunity to comment.

Sincerely,

Corey O. Stephens
Staff Engineer
Engineering & Air Safety Department