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FAA-99-6717-19

Department of Transportation
Federal Aviation Administration
Office of Chief Counsel
Rules Docket Office (29547)
800 Independence Avenue, SW
Room 915-G
Washington, DC 20591

Subject: **207-Minute** Extended Range Operations With Two-Engine Aircraft (**ETOPS**)
Operation Approval Criteria (Docket No. **29547**)

Gentlemen:

Pratt and Whitney supports the extension of **ETOPS** beyond **180** minutes. The reliability of modern aircraft engines which are properly maintained is more than adequate to meet the safety requirements of twin engine aircraft flying long distances away from suitable landing sites.

Sincerely,

Michael C. Romanowski, Manager
Flight **Safety** and Airworthiness