



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

Federal Aviation Administration
Office of the Chief Counsel
Rules Docket Office (29547)
Room 9 15G
800 Independence Avenue, SW
Washington, DC 20591

Dear Sir or Madam:

The Air Line Pilots Association (**ALPA**) has taken the opportunity to review the subject request by the Air Transport Association (**ATA**) for the FAA to issue a policy for **207-minute** Extended Twin Engine Operations (**ETOPS**) approval criteria. As discussed in the request for public comment announcement, **ALPA** participated in the **ATA ETOPS** Working Group that developed the subject Draft Proposal and agrees with the content of that proposal. **ALPA** would like to take this opportunity to reinforce a number of the items contained in the proposal.

Use of 207 Minute Authority

As outlined in the proposal policy letter, **207-minute** authority can only be used on an "exception" or flight by flight basis. The proposed **15%** extension would not be used to increase the operating area for **ETOPS**, but would simply provide the applicant airline operational and dispatch flexibility in those cases where an existing **180 minute ETOPS** route could not be dispatched at **180** minutes because of enroute winds for example.

In order to ensure compliance with the intent of this policy letter, **ALPA** suggests that an Industry/Government **ETOPS** Working Group be formed. This working group would meet on a regular basis to review operational information regarding all **ETOPS** operations and those operations where **207-minute** authority was exercised.

Alternate Airport Availability and Rescue and Fire Fighting Services

It was a fundamental agreement within the working group that this draft proposal not be used as a basis for, or encouragement for, the closure of existing **ETOPS enroute** alternate airports or a reduction in emergency services available at those **enroute** alternates. Budget cuts in a number of areas have lead to the erosion in the number of alternate airports available to not only **ETOPS** operations, but also all long-range operations. A further reduction is unacceptable and FAA and industry must work together to identify ways to ensure that the availability of current **enroute** alternates is maintained.

As far as emergency services available at **ETOPS enroute** alternate airports is concerned, **ALPA** agrees with the proposal that the aircraft must remain within **207-minutes** of at least one airport which has rescue and **fire** fighting services equivalent to **ICAO** Category 7 or higher. As stated previously, the continued viability of current **enroute** alternate airports must be maintained. Such capabilities as legitimate levels of emergency services are an integral part of such a commitment. Further, for all long range operations, crews must be provided with sufficient information on airport rescue and fire fighting capabilities at all airports along the route of flight to enable them to make informed divert decisions.

Necessity for Long Range Regulations

Currently, the regulations that govern **ETOPS** operations are found piecemeal in the **FARs** (Parts 121 and 25), Advisory Circular AC 120-42 and **ETOPS** Policy Letter 95-1. Now **ATA** is proposing an additional policy letter for **207-minute** approval criteria. It would have been a more prudent course to revise current regulations to include this added authority. **ALPA** however, understands the expediency of a policy letter and believes that all our concerns have been met in the context of such a document. Clearly there is a need to codify all of the regulations which govern **ETOPS** operations into the **FARs**. **ALPA** believes that no other significant expansion of **ETOPS** should be undertaken until this is accomplished.

Those requirements currently in place have resulted in an excellent safety record and, as stated by the **ATA** proposal, such requirements of the **ETOPS** process have lead to safety enhancements for twin engine aircraft as compared to three and four engine aircraft used in long range operations. Two examples are the requirements for an **enroute** alternate and for cargo **fire** suppression capability. **ETOPS** operations require the availability of an **enroute** alternate airport while long range operations of three and four engine aircraft do not. Clearly some of the same circumstances that would necessitate a diversion for an **ETOPS** aircraft would also necessitate a diversion for a **3-4** engine aircraft. **ETOPS** aircraft are required to have sufficient cargo **fire** extinguishing agent for the maximum diversion time plus **15** minutes. Currently there is no regulatory requirement that specifies the length of time protection for 3 or 4 engine aircraft. Consequently, it is **ALPAs** belief that there is a need to develop a new set of regulations which would apply to all long-range operations regardless of the number of engines.

ALPA appreciates the opportunity to comment.

Sincerely,



Captain Robert Reich, Team Leader
ALPA Extended Twin Operations Project *rst*

RR:nst