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INTERNATIONAL AIR CRASH VICTIMS FAMILIES GROUP

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Their affiliates - and individual families
from other international air tragedies

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June 7, 1999

Federal Aviation Administration,
Office of the Chief Counsel,
Rules Docket Office (29547)
800 Independence Avenue, SW, Room 915-G
Washington, D.C., 20591

1999 JUN 7 P 1:08
OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

Gentlemen:

Subject: Docket #29547
207 minutes extended range operation
approval criteria (ETOPS)

Attached please find two copies of comments on the above.

We also enclose an additional copy with a self addressed
stamped envelope with the request to return this copy - as
received.

Thank you.

With best regards



Hans Ephraimson-Abt

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(ETOPS) DOCKET # 29647

**COMMENTS: 207 minutes extended range operation approval
criteria**

June 7, 1999

As surviving **families** of air crashes that occurred on
transatlantic and transpacific flights over water, with total fatalities,
we have a special interest in the proposed **regulation** to allow two
engine planes being used for extended **207** minutes separation

between suitable airports.

We have great concerns about the requested extension of the range of separation between airports for two engine aircraft from **180 minutes** to **207 minutes** (with an overage of 15% - extending the range even further to **224 minutes** **between** suitable airports).

Such authority, if granted, **would allow two** engine aircraft to be used increasingly on the North **Pacific** routes. Such extension cannot be in the interest of the safety and security of air passengers. It would also impose an almost **impossible** burden on all those who who ultimately have to deal with the **aftermath** of a crash with catastrophic consequences.

While travel by air can be considered relative ly safe, accidents, if they occur, result increasingly in a **totality** of fatalities - especially on flights over **water**. The resources needed to deal with the **aftermath** of such' tragedies - far away from **homebase** - are considerable. One has only to **remember** what resources were needed in the aftermath of the **TWA800** and of the **SWISSAIR 111** crashes, which happened off shore from New **York** City and from Halifax, Nova Scotia. **Image** any such tragedy occurring on a two engine aircraft in the Pacific Ocean, far away from major airports **and/or** support centers.

Recent studies have found that **most** specifically on the Pacific resources to deal with a **major** air transport tragedy

are from **limited** to nonexistent, both on land and on the islands.

The assets available from the Coast Guard and from the US Navy are **limited** - and resources from other countries are sparse, if **available** at all. We refer most **specifically** to a recent study conducted by the "Pacific Development Council". The same paucity exists over the most northern air routes - especially near or on Russian territory.

The discussion published in the docket mentions the **communications** difficulties which can **occur** under certain conditions .

The fact that two engine aircraft have operated up to now without major accidents should not **lure** us into a false sense of safety and security.

- o - There is no guarantee that in a worst case scenario both engines of a two engine plane may not fail.
- o - There is no guarantee that if one engine fails the second engine can carry the **load** of the plane for **224** minutes (**3** hours and **44** minutes).
- o - There is no guarantee that over the Northern Pacific Route there **is** an operable alternate **reachable** or suitable **airport** available if weather or other conditions should prevent the use of the designated emergency landing site.
- o - The **ETOPS** group does not seem to have considered the loss of life which **may** be caused by an almost

inevitable crash, nor the more than a billion dollar cost such tragedy may cause as demonstrated in the TWA800 and SWISSAIR 111 incidents.

The inevitable consequence is that the risk of possible crashes over the sea is vastly increased with substantial loss of life and horrendous cost to the public.

It is suggested:

- o - That the present application for extension of separation from 180 minutes to 207 minutes be held in abeyance , pending further studies.
- o - That a Public Hearing be held.
- o - That the ETOPS work group be enlarged to include representation from all interested parties.
- o - That a study be made to create a catastrophic event insurance rider to cover the cost which may be incurred in case of the increased risk of operating two engine planes over vast expenses of water with extended separation between available emergency landing sites.

Respectfully submitted,


A. Frank Carven III Hans Ephraimson-Abt