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Federal Aviation Administration
Office of Chief Counsel
Rules Docket Office (29547)
800 Independence Avenue SW
Room 9 15-G AGC-200
Washington, DC 2095 1

Re: Docket No 29547

Gentlemen:

I strongly support the proposal to extend ETOPS to 207 Minutes. ATA member airlines along with the Air Line Pilots Association worked diligently to determine additional requirements associated with the proposed extension. These additional requirements along with a comprehensive airplane reliability study, starting with the B-777, clearly reflect 207 Minute ETOPS as a safe operation best serving the interests of the traveling public, the environment and the industry. Conditions that go with 207 Minute ETOPS include tighter dispatch constraints, improved communications, more systems redundancy and a comprehensive monitoring program. Couple the foregoing with the fact that the extension will be used on a case-by-case exception basis and it is very apparent that 207 Minute ETOPS is a logical extension to 180-Minute ETOPS.

Sincerely

Sam McWilliams, Manager
Flight Standards and
Operations Support