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To: 9-NPRM-CMTS
Priority: Normal
Subject: FW: Docket 20547

OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

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> <<...>>
> 1600 Smith Street
> 19th Floor
> Houston, Texas 77002

> June 10, 1999

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

> Re: Docket number 29547
> 207 Minute ETOPS Approval Criteria

> Dear Sirs and Madams:

> This letter is in support of the proposed 207 minute ETOPS authority
> referenced in the above docket number.

> Continental Airlines supports the proposal. We respectfully ask the
> Administrator to consider the following comments in evaluating the
> proposed extension:

> * The proposed authority will benefit the traveling public, for it
> will lead to reduced enroute times across the North Pacific. This is so
> because the extended diversion authority will allow the selection of
> enroute ETOPS alternates that will maximize the carrier's ability to
> flight plan along the most efficient route.

> * Enhancing the carrier's ability to operate with maximum
efficiency
> in the North Pacific will positively impact the economics of the specific
> route both to the carrier, and ultimately the traveling public.

> * The proposed authority will benefit the traveling public, for
the
> dispatch reliability of North Pacific ETOPS operations will be enhanced
> thus benefiting schedule reliability.

> * The proposed authority will allow, in certain conditions, the
flight
> to be planned where the path of flight will remain closer to a greater
> number of adequate airports in the Aleutian chain, even though at the

time
> of dispatch these airports may not fit the definition of suitable. This
> will ultimately place more diversion options at the disposal of the
pilot.
>
> * The equipment and dispatch specifications detailed in the
proposal
> are more conservative than those required by 180-minute diversion
> authority; and therefore more than compensates for any added risk factors
> which the additional diversion time might portend.
>
> * The equipment specifications detailed in the proposal define a
level
> of sophistication in the aircraft design that goes far beyond the
aircraft
> that were originally approved for 180 minute diversion authority. This
> ensures that at least an equivalent level of safety is inherent to the
> 207-minute proposal.
>
> * The Airline Pilots' Association and the Independent Association
of
> Continental Pilots have publicly endorsed this proposal. Both groups are
> highly experienced in ETOPS operations from a pilot's perspective, and
> have a vested interest on behalf of their members in the safety and
> operational integrity of the proposal.
>
>
> * The record of ETOPS operations conducted under Part 121 would
> suggest that extending the diversion authority beyond 180 minutes,
> particularly given the added conservatism and narrow scope inherent to
> this proposal, presents benefit to the traveling with no degradation in
> safety.
>
> These comments are respectfully submitted to the Administrator for her
> consideration.
>
> Sincerely,
>
> <<...>>
> Deborah L. McCoy
> Vice President, Flight Training and Inflight


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