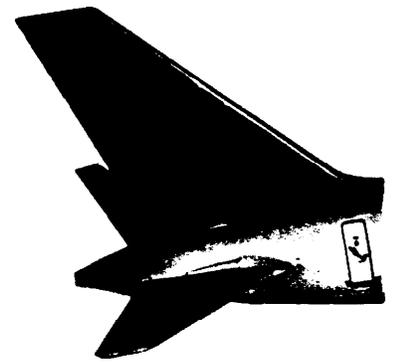


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FAA-99-6717-27

June 11, 1999

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

This is in response to a call for comments on docket number 29547 (207 minute ETOPS). American Trans Air Inc., a 180 minute Extended Twin Operations carrier, recognizes the tremendous value of the ETOPS program. American Trans Air has flown ETOPS since 1991 and was the first 121 carrier authorized to fly 120 minutes ETOPS with the Boeing 757 equipped with Pratt & Whitney engines.

The policy letter proposed by Air Transport Association recommends a 15 percent extension of the 180 minute rule on "day of flight", when necessary due to Airport Closures or Weather/Meteorological conditions along the intended route. This would allow ETOPS operations up to 207 minutes. American Trans Air is in complete agreement that the need for the 15 percent extension is operationally necessary and technologically sound and we fully support this effort. However, it is important to note that this extension is being justified under the tremendous safety record of the current world ETOPS fleet. There are limitations contained in the proposed policy letter that concern us.

These concerns revolve around a shift from the original source document philosophy. Advisory Circular 120-42A was general in nature. The advisory circular outlined a basic set of equipment and program requirements which led to the extended ETOPS approval. The proposed ATA policy letter would mandate specific technologies such as SATCOM instead of general requirements called for in CFR 14 for "Rapid and Reliable Communications". The logical foundation of CFR 14 applies to 207 minute ETOPS as well as 180 minute ETOPS. It is important to continue using the original logic, because if a specific technology changes over time the guidance would have to be revised while the minimum requirement remained the same. Policy letters of this type must be written to a general program specification and unless absolutely necessary avoid requiring specific equipment. There is strong logic in the source document. Should an operator desire to exceed the minimum specification for a program, operational approval of those additional requirements would simply be placed in their application. To further explain American Trans Airs position, it seems illogical to use reliability developed by a technology such as High Frequency Radio Communication that is acceptable for frequent and routine 180 minute operations, yet exclude that technology from "infrequent" day of flight extensions.



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Specifically, American **Trans** Air objects to the following, as stated in the policy letter proposal:

1. The requirement for Satcom: "Operators shall use satellite communications (**SATCOM**) voice and/or **SATCOM** data-link as a minimum in order to meet **14 CFR** requirements for rapid and reliable communications".

The idea that **HF** radios are acceptable to meet **CFR 14** for **180** minute **ETOPS** and beyond **207** minutes for Three engine and Four Engine **Aircraft**, but are not acceptable for **207** minutes **ETOPS**, is not logically supported by any study cited in the policy letter. **This** restriction also excludes other acceptable means of communication such as **HF** data-link, which should be accepted to meet future oceanic surveillance requirements soon.

2. The requirement for SATCOM data-link for en-route alternate updates. "Operators shall, prior to the extended range entry point, use data-link to update any revised flight plan (company communications) if required as a result of reevaluation of aircraft system capabilities and en-route alternates. Dispatch will review en-route alternates and advise the flight crew of all suitable alternates within **207** minutes of the planned routing".

This restriction eliminates **HF** data-link and any voice method to update en-route alternates. This again is not supported in the policy letter by any study that shows **SATCOM** to be the only technology suitable and completely disregards the previous methods used to obtain a **180** minute **ETOP** approval and alternate methods and technologies available to three and four engine aircraft

3. Alternate boost pump power source required "At least one fuel boost pump in each main fuel tank must be able to be powered by a backup electrical power source other than the primary engine driven or **APU** driven generator".

No study shows that fuel suction feed has ever adversely impacted any **ETOPS** flight. If there is no requirement for dual powered boost pumps for regular and frequent **180** minute **ETOPS**, there is no logical reason to require them for an additional **27** minutes of less frequent day of flight operations. To say this is a valid requirement for **ETOPS** effectively eliminates our **ETOPS** program. It also eliminates most other engine and airframe combinations. All but the newest Boeing and **Airbus** products would require major redesign and modification programs. No study shows that suction feed of fuel has adversely impacted any flight and isn't technologically sound for use for another **27** minutes.

4. Rescue fire-fighting services (RFFS) are too restrictive. "Operators shall ensure that adequate levels of **RFFS** for en-route **ETOPS** alternates are available. For the case of **207-minute ETOPS**, the aircraft must remain at all times within **207** minutes of at least one adequate airport (as defined in **AC 120-42A, Appendix 3**) which has an **RFFS** of International Civil Aviation Organization (**ICAO**) Category 7 or higher. If such equipment is not available on the airport, an equivalent level of support must be reasonably accessible given notification of the divert"

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With many ongoing industry efforts under consideration to actually reduce the **RFFS equipage** category, we do not understand the logic for increasing the requirement only for less frequent **207** minute **ETOPS**. Why should an aircraft approved for **207** minute **ETOPS** have increased **RFFS** requirements over a **180-minute** aircraft or any other aircraft for that matter. Again, no study has been presented to support this position. American **Trans** Air does not believe that the specific requirements referenced above are technically supported or justified.

In summary, American **Trans** Air Inc. agrees with the **207** minute **ETOPS** concept but recommends the industry and the FAA to continue to work on a policy letter that does not mandate a single source of technology and does not eliminate most of the world fleet from operating under the proposed extension, that developed the reliability that supports the extension. To accept a policy that eliminates that same world fleet from the extension benefits would not be in the public's best interest and appears to be a veiled attempt to place competitive barriers in this program.

Sincerely,



William D. Beal

Vice President of Flight Operations



Randy E. Marlar

Vice President of Maintenance and Engineering