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U.S. Department of Transportation
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GENERAL COUNSEL
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2000 FEB 24 P 3:12

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|----------|---|----------------------|--------------------------|--------------------|-------------------------------------|---------------------------|
| To: | AGC-200, Rules Docket | Date: | February 18, 2000 | | | |
| Subject: | Docket No. FAA-1999-6482 - 17 Revisions to Digital Flight Data Recorder Regulations for Boeing 737 Airplanes and for Part 125 Operations | | | | | |
| Action: | <input type="checkbox"/> | Per Your Request | <input type="checkbox"/> | Discuss With Me | <input type="checkbox"/> | Take Appropriate Action |
| | <input type="checkbox"/> | For Your Information | <input type="checkbox"/> | For Your Approval | <input type="checkbox"/> | Please Answer |
| | <input type="checkbox"/> | Per Our Conversation | <input type="checkbox"/> | For Your Signature | <input type="checkbox"/> | Prepare Reply For: |
| | <input type="checkbox"/> | Note and Return | <input type="checkbox"/> | Comment | <input checked="" type="checkbox"/> | Send to Electronic Docket |

Remarks:

Please send the attached document to the electronic docket for Docket No. FAA-1999-6482, Revisions to Digital Flight Data Recorder Regulations for Boeing 737 Airplanes and for Part 125 Operations.

Thank you,

Terry Subblefield
Transportation Industry Analyst, FAA,
Office of Rulemaking, ARM-208

Phone: 202-267-7624

FAX: 202-267-5075

Attachments:

Comment from M.J. Holland, Audi Arabian Oil Company

Date: 2/8/00 10:50 AM
Sender: George Kaseote
To: <hollanmj@aramco.com.sa>
cc: Karen Petronis; Terry Stubblefield; Gary Davis; David Hempe; Richard Jennings
Priority: Normal
Subject: ~~Re: FW: NPRM Docket No. FAA-1999-6482 Notice No. 99-19 Re~~
~~Subject: FW: NPRM Docket No. FAA-1999-6482 Notice No. 99-19 Rev. o~~
~~Author: <hollanmj@aramco.com.sa> at SMTPgate~~
Date: 2/8/2000 8:51 AM

Please acknowledge receipt of my request.
Best Regards,
JAY

From: Mason J. Holland[SMTP:hollanmj@aramco.com.sa]
Reply To: hollanmj@aramco.com.sa
Sent: January 22, 2000 9:04 AM
To: 'George.Kaseote@faa.gov'; 'Edwin Christensen'; 'Stanley B Roberts'
cc: Omer, Michael L; 'H.H. Nijim'; 'Roy D. Young'
Subject: NPRM Docket No. FAA-1999-6482 Notice No. 99-19 Rev. of DFDR
for
737 airplanes
Importance: High

Mr. Kaseote,
I have been reading the above NPRM and have a question.

Page 32 of the NPRM in Paragraph 2 "Changes to Part 125" Changes will be made to 125.226 and to appendix E of Part 125. Paragraph 3 "...aircraft that are operating under a deviation authority from part 125 must still comply with the flight data recorder requirements of part 125 for the particular aircraft. This requirement would apply to all aircraft, not just the B-737". Paragraph 4 "This requirement is proposed as a new paragraph 125.3 (d),....."

My questions are:

1. If we are operate under Part 125.1(c) "The rules of this part, except Paragraph 125.247, do not apply to the operation of airplanes specified in paragraph (a) when they are operated outside the United States by a person who is not a citizen of the United States". Would the new rule, if adopted, apply to us?

2. If we had an exemption to Part 125.247 (not a deviation) to Part 91.409 would the new rule (if adopted) apply to us?

Please advise as soon as possible.

M. J. Holland, Supervisor
Quality Control Unit
Saudi Arabian Oil Company
Aviation Department
Dhahran, Saudi Arabia