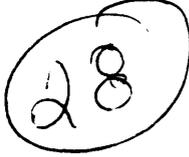



**UNITED AIRLINES**

  
**OFFICE OF THE  
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**Maintenance Operations**

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Office of the Chief Council  
 Docket Office #29547  
 800 Independent Avenue SW  
 Room 915-GAGC-200  
 Washington DC 20951

**207 Minute ETOPS** for proposal Docket #29547. **Public Comment.**

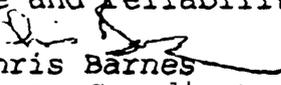
To whom this may concern.

Docket #29547 specifically applies to the 777-200IGW aircraft on an exception basis when alternate stations are not available. Without the additional 27 minute relief in these situations the aircraft is forced to fly south to stay within 180 minutes of Midway. West heading flights are exposed to 200 knot head winds in this region lengthening the mission by up to 1 hour and 47 minutes.

207 Minute ETOPS will permit a faster northern passage due to favorable winds. In most cases the aircraft would be no greater than 10 to 17 minutes beyond the 180 rule,

The Boeing 777 was primarily designed from the keel up as an ETOPS aircraft. In fact the extensive backup & alternate systems were sufficient to enable "180 minutes ETOPS out of the box" for a new aircraft/engine combination. United Airlines flew the first 777 ETOPS 180 minute flight on the inaugural flight LHR-IAD in June 1995. Since then UAL has flown over 350,000 hours & over 22,000 flights at 180 minutes ETOPS. UAL have experienced 2 mechanical problems in the ETOPS zone. Both were just after ETOPS entry and happened just after introduction of 777. Each event was due to early design deficiencies and were not engine related. In short long range operational behavior of the UAL 777 fleet has been exemplary.

Approval of the 207 Minute ETOPS proposal is justified for 777-200IGW aircraft based upon performance and reliability history.

  
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