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UNITED AIRLINES

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OFFICE OF THE
 CHIEF COUNSEL
 RULES DOCKET
 June 18, 1999

World Headquarters

Federation Aviation **Administration**
 Office of Chief Counsel
 Rules Docket Office (29547)
 800 Independence Ave. SW
 Room 915-G AGC-200
 Washington, DC 20951

1999 JUL -9 A 8:54

FAA-99-6717-33

Re: Docket No. 29547 – 207 Minute Extended Range Operations.

United Airlines strongly supports 207 Minute **ETOPS** in the North Pacific and urges the FAA to adopt the approval criteria published in the subject docket.

The success of **ETOPS** in the North Atlantic since 1985 is supported by an outstanding reliability and safety record. As a result, **ETOPS** flights exceed the number of three and four engine operations combined. Throughout this fourteen year growth period, each step in the **ETOPS** evolution to 180 Minute authority was very conservative with flight safety as the primary consideration. The most recent step in this process was the delivery of the **B777**, an airplane that was designed from the start as an **ETOPS** platform which incorporates lessons learned since the start of the long range, twin engine, over water operations.

U.S. Airlines have now started 180 Minute **ETOPS** operations in the North Pacific. This larger, more diverse area of operations provides new challenges due to distances between city pairs, weather patterns, and the location of and fewer number of **enroute** alternate airports. Extending **ETOPS** to 207 Minutes for those airlines who have 180 Minute **ETOPS** authority will address the requirement of operations in this area while providing a level of safety equal to or greater than current **ETOPS** authority based on the following:

- Increased operational and communications requirements
- Increased systems redundancy requirements
- Tighter minimum equipment constraints
- A reliability study validating airframe/engine/systems suitability for 207 Minute **ETOPS**
- Optimized **enroute** diversion airport availability
- Reduces delays, cancellations and possible diversions and as a result, minimized passenger inconvenience due to associated late arrivals and missed connections
- Optimized environmental issues by decreasing longer flight times that may be associated with 180 Minute **ETOPS**
- A comprehensive industry/FAA monitoring program

Considering the foregoing, 207 Minute **ETOPS** is prudent, safe evolution of **ETOPS** authority. The Air Transport Association, Airline Pilot Association and other industry parties have worked diligently to successfully address safety, airplane systems, technical and operational issues associated with this improved authority. United strongly supports their efforts and implementation of 207 Minute **ETOPS** as defined in the subject docket.

Sincerely,

Captain Stephen A. Forte
 Senior Vice President
 Flight Operations