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Federal Aviation Administration
Office of Chief Counsel
Rules Docket Office (29547)
Room 9159
800 independence Avenue, SW
Washington, DC 20591

OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET
1999 SEP 17 A 10:56

207 ETOPS REVISED TEXT

Dear Sir or Madam,

The International Federation of Airline Pilots Associations (IFALPA) thanks you for the opportunity to comment on the proposal to extend diversion time to 207 minutes for Extended Twin Operations (ETOPS). Our colleagues in US-ALPA have been involved in the consultation process and have informed IFALPA of their support for this proposal, along with the rationale for that decision. The Federation believes that the Task Force's draft proposal contains many safety enhancements, not just for ETOPS, but for all Extended Range Operations. It fully supports these efforts to make operations over large expanses of water and hostile environments safer and commends the Task Force for its work.

There are, however, two fundamental concerns about this proposed extension. Firstly, is the principle as to whether an extension should be granted outside the original Type Design Approval of 180 minutes diversion time. The 207 minute figure was derived from the application of the "15% extension rule" applied to the 180 minute ETOPS diversion rule. The crux of this debate is whether the existing TDA can or should be extended or whether a new TDA should be required. Whilst the Federation accepts that there has been a precedence in granting of an extension outside a TDA, namely the 120 minute diversion distance, it believes there are significant differences in the two cases. The granting of the extension to the 120 minute diversion distance was to enable Atlantic crossing in winter when the northern airfields (KEF, SFJ, etc) were below ETOPS minima. This approval allowed the usage of alternates with good weather factors (e.g. SMA, TER) whilst in the Pacific the extension will require the use of alternates with bad weather factors (e.g. Shemya). Whilst still questioning the underlying principle, it could be argued, in the Atlantic case, that the exemption improved the safety of the ETOPS operations, whilst in the Pacific case the opposite would be true.

Secondly, the Federation is concerned that the granting of the extension to the diversion time will become a regular procedure for commercial rather than safety reasons. Whilst a monitoring procedure will be set-up, the Federation is concerned that it will not provide the means for adequately monitoring nor, be able to objectively assess the grant of approval for each flight dispatched under the 207 extension.



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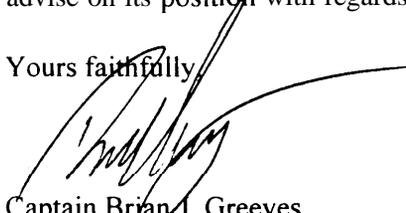
In addition, the Federation believes that the proposed means of validating this procedure is not an appropriate method, since such flights equate to doing flight testing with passengers. Furthermore, it does not believe that six month's worth of such flights will provide sufficient valid statistical data to verify the concept, unless the operators are going to deliberately shut down engines to acquire it (an unlikely scenario). Thus, it can only be given any real credence if a proper and valid analysis of the aircraft and operation is carried out. The in flight experience likely to be gained by US operators will not be equivalent. Finally, there is the fundamental issue of the remaining redundancy of a twin on one engine and the need to restrict the period of exposure in this condition.

The Federation has a number of other significant technical concerns. It shares the British Airline Pilots' Association's view for the need to lower the proposed IFSD rate and the provision of a reliable third bleed source.

Finally, IFALPA believes that the unilateral implementation of this procedure will be counter to the harmonisation process. It believes that it would be appropriate to involve ICAO in a review of this proposal in order to produce an agreed international rule making. This would also ensure that any suspicion of national commercial advantage is removed.

The Federation wishes to advise the FAA that it reserves its position on this proposed extension to the diversion time. The IFALPA Aircraft Design and Operations Committee will be meeting in November in Seattle and, at that time, Captain Bob Reich (US-ALPA) and Captain Chet Ekstrand (Boeing AC) will make presentations on this topic. It would be useful if a representative from the FAA could also be present to expand on the Administration's position. Following that meeting, the Federation will write to advise on its position with regards to this proposal.

Yours faithfully,



Captain Brian J. Greeves
on behalf of the President.