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U.S. Department of Transportation Dockets
400 Seventh Street, SW -- Room Plaza 401
Washington, DC 20590

DOCKET #FAA-99-6717-45

***ACTION: Request for comments on disposition of comments;
Policy statement for 207 Minutes E TOPS***

The extensive discussions and valuable comments whether to allow an increase in flight separation from airports with adequate landing strips from 180 to 207 minutes on the North Pacific routes continues to ignore if enough assets are available in the region to handle emergency landings -- especially at night -- or deal with even more extensive tragedies. The arguments made raise the serious question whether the present separation between airports on North Pacific over water flights of 180 minutes is not already too extensive.

We support the intended broad review of ETOPS under the auspices of a new Aviation Rulemaking Advisory Committee (ARAC) process.

We vehemently and firmly oppose the intention of the Federal Aviation Administration (FAA) to authorize the 207 minute separation as of March 21, 2000 before the intended ARAC Committee has even been formed and staked its review.

All parties which press so firmly for the 207 minute authorization, including the FAA, will rue this premature decision to extend flight separation once a major or even a minor emergency or accident occurs over the Northern Pacific route – between 180 and 207 minutes, or even before. The recent Swissair 111 and Alaska Air 261 and KAL 801 Guam crashes should teach us a lesson.

This is not a question which type of aircraft should be certified for extended flights. What we all are discussing are the flights on the North Pacific Route – an area of wide water expanse, with many islands of various size and population, with very limited resources.

Nor is it a question only of the length of suitable runways for landing. What about the available infrastructure once a flight with hundreds of passengers is landing and after it has landed.

We are talking about weather reports and satellite positioning, as well as communications. What about ashes which are ejected from the very active volcanoes in the Pacific ocean area, or the intense smoke caused by slash burning in Indonesia and in other parts of the Pacific?

Finally, what assets are available on the ground in case a plane crashes because the pilots do not have 180 minutes to reach the nearest landing strip – with possible minimal equipment - least of all 207 minutes?

We do know from recent over water crashes: TWA800, Swissair 111, Egyptair990, Alaska Air 261, Aeroperu, Kenya Air, Ethiopian Airlines and others which did not have 180 or 207 minutes to reach safe heaven and crashed into the Pacific, the Atlantic and other Oceans at much less than the authorized and now extended separation.

We cannot ignore the “Pacific Development Council’s recent study about the paucity of available assets in their area and we know – not the least from

the KAL007 tragedy - what limitation exist in the most Northern Pacific routes bordering Russia – and within Russian territory.

Are we going to base our decisions on the the desires or needs of some or are we learning from past experiences which touched us all. Should we not proceed with a sober sense of reality, as well as with caution where the fate of human lives are involved, in the interest of all, taking into account flight safety, security and the concern for the human beings - passengers and crew alike - that are exposed to the vagaries and to the scattered, limited assets available in the North Pacific – which is much deeper than most other oceans.

THERE IS ABSOLUTELY NO URGENCY TO AUTHORIZE THE EXTENSION OF SEPARATION FROM 180 MINUTES TO 207 MINUTES. The carriers are all profitable. The manufacturers have good order books – years in advance.

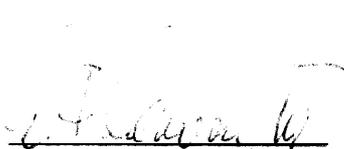
Therefore, no harm is done to anybody by that DECISION BEING DEFERRED until the planned ARAC Committee has concluded its deliberations and has submitted its report and recommendations.

Should the FAA however persist in allowing the 207 separation to take effect as intended, then at least it should make it mandatory for the carriers and for respective plane manufacturers to:

- Carry supplemental liability insurance for the North Pacific flights,
- Waive any and all liability defenses

It is further SUGGESTED that the ARAC COMMITTEE BE EXPANDED to include representation of other interested parties, beyond the air carriers, the pilots association and the manufacturers - all parties that tend to benefit And that are the initiators of ETOPS 207 minutes initiative.

Respectfully submitted.


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