

Association of Professional Flight Attendants
1004 W. Eules Boulevard
Eules, TX 76040

March 6, 2000

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

Re: Docket No. FAA-99-6717

Dear Madam/Sir:

These comments are submitted on behalf of the Association of Professional Flight Attendants (APFA) representing the 22,000 flight attendants at American Airlines. The proposed extension of ETOPS authority from 180 to 207 minutes raises concerns that a diminished safety margin will result. Particularly in light of the concerns expressed by the Coalition of Air Line Pilot Associations (CAPA) including the Allied Pilots Association, the Independent Pilots Association (IPA), the Fedex Pilots Association (FPA), International Brotherhood of Teamsters representing Airborne Express and SWAPA (totaling over 25,000 pilots), the APFA urges the FAA to postpone indefinitely the introduction of 207-minute ETOPS in the North Pacific. The APFA supports the Conclusions and Recommendations submitted by CAPA in its comments for this docket.

In addition, from the Federal Register Notice dated January 21,2000:

Under Item 1. No justification for Change (page 3521), it states:

"The introduction of a 207-minute authorization would provide an air carrier with additional flexibility with the dispatch of an ETOPS flight, which may in fact position the flight closer to more enroute alternate airports. This would be both an operational and safety benefit."

This statement is misleading and ignores the pertinent fact that aircraft will, during other flight intervals, be 207-minutes from an alternate airport. This extension appears to provide support for marketing the B-777 as a replacement for older, three and four engine aircraft.

The APFA supports the formation of an ARAC group to be tasked with providing recommendations concerning all long range operations.

Item 5. The APFA strongly believes that ETOPS should be handled through the regulatory process rather than through Advisory Circulars and Policy Letters. Regulations would ensure a more thorough review of the factors associated with an extension and provide an opportunity for the FAA, air carriers, and pilot organizations to come to a meeting of the minds on the safest possible operations of aircraft.

Thank you for this opportunity to comment. Please contact Kathy Lord Jones, APFA Safety Coordinator, at 800-395-2732 ext. 8302 with questions.

Sincerely,

Kathy Lord Jones
APFA National Safety Coordinator