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March 6, 2000

U. S. Department of Transportation Dockets
Docket No. FAA-99-6717
400 Seventh Street, SW
Room Plaza 401
Washington, DC 20590

-48

Re: 207 Minute ETOPS Proposal For Docket No. FAA-99-6717 – Public Comment

United Airlines Flight Operations Support continues to strongly support 207-minute ETOPS in the North Pacific area of Operations using the B-777 airplane. 207-minute ETOPS provides a level of safety equal to or greater than 180-minute ETOPS, has a positive effect on the environment due to shorter flight times/less fuel burn, enhances service to the travelling public by ensuring a more stable scheduled operation and ensures enhanced efficiency in the North Pacific area of operations.

We have thoroughly reviewed the Federal Register comments summary including the latest comment summary by JAA on behalf of European Members. All comments/issues mentioned were addressed in detail and resolved as part of the process associated with the Air Transport Association, ETOPS Subcommittee (representing U S airlines) proposed 207minute ETOPS Policy Letter and supported by ALPA and IACP. We therefore do not intend to comment on each issued raised. However, following are comments on selected issued we feel are essential to understanding the value of 207-minute ETOPS

- 65FR3521, Item #3 (the proposal is too broad).
- AECMA Comment #5.

Firstly, it is our understanding that the FAA in its response to comments (under Item 3 above) stated that... "the 207 minute ETOPS operations are intended to apply only to the North Pacific area of operation, and then, only when conditions prevent a 180-minute dispatch. We presume by the brief statement "only when conditions prevent a 180-minute dispatch" the FAA was actually referring to the statement in the Policy proposal submitted by ATA, ALPA and IACP, and the FAA was showing concurrence. The statement in the Policy proposal read "such extensions (to 207 minutes) can only be applied to a route where adequate enroute alternate airports exist and are available and that, if defined as 'suitable' for dispatch as per paragraph 10(d) of AC 120-42A, the route could be flown at 180-minute ETOPS authority."

United draft procedures support the foregoing statement reflecting that 207-minute ETOPS may be used when normal 180 minute ETOPS cannot be used on the desired route due to a lack of ETOPS enroute alternates. The use of 207-minute ETOPS is on a case-by-case exception basis and is limited to a route where adequate enroute alternate airports exist that could support 180 minute ETOPS but are not suitable for dispatch.

Regarding FAA comment on Item #3 and AECMA comment #5, it is strongly recommended that the criteria for 207 vs 180-minutes be based on desired routes or routes in close proximity rather than a track that could be flown in the area of operations. The latter criteria could result in operating great distances from airports that could be used enroute and/or by flying substantially lower flight times.

Regarding both of the above comments, the two attached examples will clear up any misconceptions about 207 minute ETOPS regarding flight times, proximity to emergency airports and overall safety/efficiency issues:

- Flight Simulation Feb 2000, SEA-NRT. Note that the flight time for 180-minute ETOPS is 9 hours 48 minutes vs. 207-minute ETOPS is 9 hours 07 minutes a difference of 41 minutes. The 10 minute Southern route puts the airplane far from enroute emergency airports with operational minimums.
- Flight 875/21 Feb 2000, SEA-NRT: The 180-minute ETOPS route flown flight time was 10 hours 37 minutes, again using Midway Island as the Mid-ocean alternate vs

207-minute ETOPS desired route flight time would have been 9 hours 30 minutes, a difference of 1 hour 7 minutes.

Although CDB, AKN, SYA and PKC were all below ETOPS minimums for dispatch, while enroute all of the airports were at or above operational minimums and could have been used as emergency airports if needed. Please note the relative proximity of these airports while flying the 207-minute ETOPS route vs the Southern 180-minute route. Compare the foregoing with the distances to emergency airports along the Southern route mentioned in paragraph 5 of the AECMA comments. The distances are dramatically greater.

Some comments are concerned with the phrase "operational necessity". That term merely is designed to allow application of 207-minute ETOPS as described in the draft policy letter.

Finally, we appreciate the opportunity to further comment on 207-minute ETOPS which places the airplane closer to a greater number of adequate airports, includes increased MEL requirements, tighter dispatch/operation constraints, enhanced communications requirements and more systems redundancy. The result is a very safe flight operation.

Thank you for your consideration.

Sam McWilliams 
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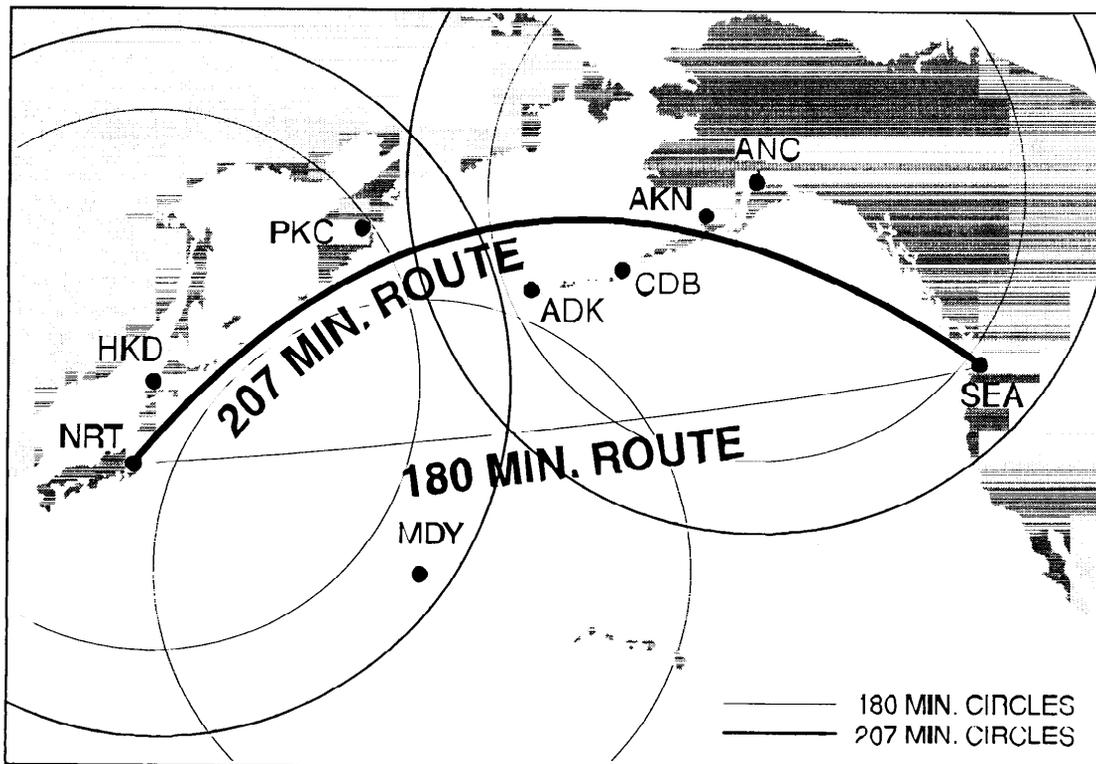
Attachments

FLIGHT SIMULATION

FEB 2000

The example below is a simulation of a 207-minute (flight 99B) and a 180-minute (flight 99 C) ETOPS flights, between SEA and NRT

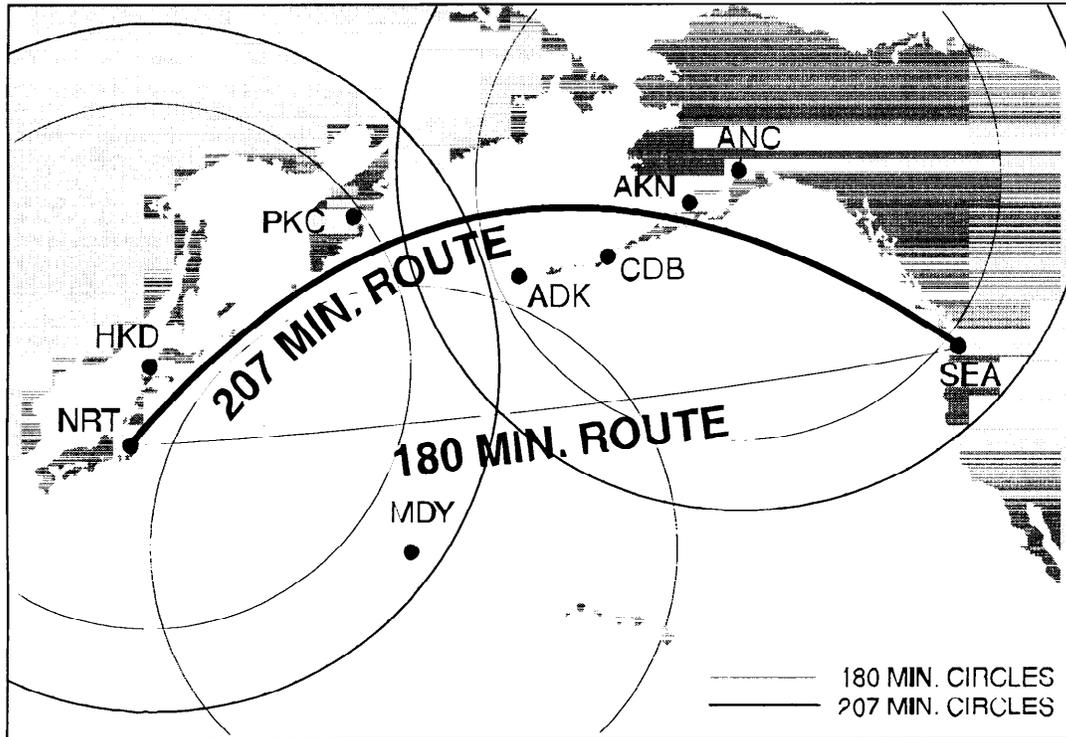
The chart below demonstrates the difference between sample routes using 180-minute ETOPS dispatch and 207-minute ETOPS dispatch. With no airports along the Aleutian Island chain or the Kamchatka Peninsula meeting the ETOPS alternate weather criteria, a southerly routing to utilize Midway Atoll as an ETOPS alternate would be necessary to remain within a 180 minute circle. This routing would put the aircraft far from land during most of the flight. Dispatching under the 207-minute authority would allow operation over the normal route between SEA and NRT. While the forecast for Alaskan and Russian airports may not support ETOPS weather requirements, they could be at or above normal operational minima and be available for a diversion once the flight is underway.



- Flight time for 180-minute route in this example is 9 hours and 48 minutes. This route would put the aircraft far from land.
- Flight time for 207-minute route in this example is 9 hours and 07 minutes. This route would put the aircraft near airports in Alaska, the Aleutian Island, Russia, and Northern Japan.

FLIGHT 875/21 SEA-NRT

Example of a flight that was dispatched on February 21, 2000.



- Flight time for this flight on 180-minute route was 10 hours and 37 minutes. This flight was restricted to FL 28.0 until 150 West, then FL31.0 until 170 West, due to crossing PACOTS traffic.
- If the Flight had been dispatched on a 207-minute route the flight time would have been 9 hours and 30 minutes. The 207-minute route would have put the aircraft near Anchorage, King Salmon, Cold Bay, Shemya, Petropavlovsk and Hakodate. All of these airports were above operational minima during the time the flight would have used them.

Summary: The forecast weather listed the northern airports below dispatch alternate minima. The actual weather was above operational minima during the flight. 180-minute flight used 22,200 lbs. more fuel and took 1 hr and 7 minutes longer than the 207-minute flight plan. By using the 180-minute route, the flight was much farther from adequate airports during much of the flight.