



**AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

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June 1, 1999

Federal Aviation Administration  
Office of the Chief Counsel  
ATTN: Rules Docket (AGC-200)  
Docket No. 28293  
Room 915G  
800 Independence Avenue SW.  
Washington, DC 20591

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FAA-2000-7952-26

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OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET

Subject: Docket No. 28293, Notice No. 95-12A, Supplemental Notice of Proposed Rulemaking (SNPRM), Service Difficulty Reports.

Dear Sirs:

The Air Line Pilots Association (ALPA), representing the safety interests of over 53,000 professional airline pilots flying for 52 airlines, has reviewed the referenced SNPRM. This document modifies a notice of proposed rulemaking (NPRM) published on August 14, 1995, that proposed revising the reporting requirements for air carrier certificate holders and certificated domestic and foreign repair stations concerning failures, malfunctions, and defects of aircraft, aircraft engines, systems and components. The original proposed action was prompted by an internal Federal Aviation Administration (FAA) review of the effectiveness of the reporting system and by air carrier industry concern over the quality of the data being reported by air carriers.

This SNPRM addresses the concerns raised by the commenters on the original proposal. The objective of this SNPRM is to update and improve the reporting system to effectively collect and disseminate clear and concise safety information to the aviation industry.

ALPA has reviewed the SNPRM and the proposed language for the associated rules. ALPA feels that the FAA has eliminated many reporting ambiguities found in the old language and made the rule language more clear to ensure more useful reports. For these reasons, ALPA **concurs** with the SNPRM.

Thank you for the opportunity to comment on this Supplemental Notice of Proposed Rulemaking.

Sincerely,

Joseph M. Bracken  
Staff Engineer  
Engineering & Accident Investigation Section

JMB/cm

cc: Jim Walters      Dave Smith      Ron Rogers  
Chris Baum      Keith Hagy      Pierre Huggins

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