



ASSOCIATION OF FLIGHT ATTENDANTS AFL-CIO

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Via fax and mail

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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

FAA 2000-7152-25

Dear Sirs:

On behalf of the Association of Flight Attendants, representing 44,000 flight attendants at 23 airlines, we welcome the opportunity to comment on Docket No. 28293, Service Difficulty Reports.

We support the proposed changes to update and improve the reporting process. This supplemental notice of proposed rulemaking (SNPRM) makes major improvements to the reporting process. We were especially pleased to see that the FAA has clarified the reporting requirements for the "stage of operation" during which the service difficulty occurred. This addresses our concern over defects occurring during ground operations.

Although major improvements have been made in the reporting process, there are two problem areas that still remain. The first is that aircraft total time and total cycles need to be recorded. Without this data, the reports are restricted to assessing only the age of the aircraft. The second problem is that station and flight numbers should be required. This would help track any problems occurring at a specific station or airport.

The Association of Flight Attendants supports the proposed rulemaking on service difficulty reports and urges the FAA to require that aircraft total time and total cycles, and station and flight numbers be recorded and then promulgate the final rule as soon as possible.

Respectfully submitted,

*Candace Kolander*

Candace Kolander  
Coordinator, Air Safety and Health

INFLIGHT SAFETY PROFESSIONALS

