



Regional Airline Association
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U.S. Department of Transportation Dockets
Docket No. FAA-2000-7554
400 Seventh Street, SW
Room Plaza 401
Washington, DC 20590.

SUBJECT: Proposed Rule: Flight Operational Quality Assurance (FOQA) Program

Gentlemen/Madam:

A separate letter is being submitted to the docket that provides the **Joint Comments** of the Aerospace Industries Association, Air Line Pilots Association, Air Transport Association of America, Coalition of Airline Pilots Association, Independent Association of Continental Pilots, and the Regional Airline Association. The RAA position on the proposed rule is accurately expressed by the **Joint Comments** response and does not need to be repeated in this letter. We offer additional comments to simply capture the disappointment expressed by our members in reading the proposed rule.

The initial hardware costs of retrofit for efficient retrieval of FOQA data is approximately \$15,000 per airplane, regardless of airplane size. Once retrofit is complete, then the operator will sustain additional labor costs to collect and analyze the data. The cost of data analysis is dependent on fleet size; the larger the fleet, the smaller the cost per airplane to analyze the data. The fleet sizes for the regional operators are obviously smaller than those operated by the major carriers. The regional operators therefore will have to not only amortize this cost over smaller fleet sizes but over airplane types that have passenger seating capacities 60 to 90% less than the larger (Boeing/Airbus/Lockheed) airplanes. The decision for a regional carrier to invest in FOQA necessitates that significant safety benefits be realized.

One RAA member has already purchased the hardware necessary to begin FOQA and began partial retrofit of their fleet. Several other members were in the formative stages of purchasing FOQA hardware when the proposed rule was published. These and other RAA members have indicated that they are unwilling to invest further in FOQA programs until the FAA's purpose in presenting the proposed rule, is clarified.

Operators of FOQA programs now enhance safety solely from their efforts through internal analysis of the data without sharing the data with the FAA. The proposed rule pointed out such benefits but then failed to provide why the sharing of data with the FAA will advance that carriers safety program over the present practice of keeping the data to themselves. Carriers don't need the FAA to analyze their data for them to realize safety benefits. In order to encourage greater investment of regional operators in FOQA, we need a firm commitment from the FAA that the data submitted to the FAA is truly voluntary, and that an operators investment in FOQA

will not be used to generate more enforcement actions against them simply because the FAA knows more about them than their competitors without a FOQA program.

Your consideration of the comments and requests of RAA and its member's, is appreciated.

Sincerely,

David Lotterer
Vice President - Technical Services

Attachment

Attachment A- RAA Member Airlines

Company	City, State
Aeromar *	Mexico City, DF
Air Midwest	Wichita, KS
AirNet Systems	Columbus, OH
Air Nova *	Enfield, Nova Scotia, Canada
Air Ontario*	London, Ontario
Air Serv	Redlands, CA
Air Wisconsin	Appleton, Wis
Allegheny	Middletown, PA
American Eagle	Dallas, TX
Atlantic Coast Airlines	Dulles, VA
Atlantic Coast Jet	Dulles, VA
Atlantic Southeast	Atlanta, GA
Austin Express	Austin, TX
Big Sky Airlines	Billings, MT
Business Express	Dover, NH
Cape Air	Hyannis, MA
CCAIR	Charlotte, NC
Champlain Air	Plattsburgh, NY
Chautauqua Airlines	Indianapolis, IN
Chicago Express	Chicago, Il.
Colgan Air	Manassas, VA
Comair	Cincinnati, OH
CommutAir	Plattsburgh, NY
Continental Express	Houston, TX
Corporate Air	Billings, Montana
Corporate Express	Nashville, TN
Eagle Aviation	Las Vegas, NV
Empire Airlines	Coeur d'Alene, ID

ERA Aviation	Anchorage, AS
Executive Airlines Inc.	San Juan, P.R.
Executive Airlines	Farmingdale, NY
Express Airlines I	Memphis, TN
Falcon Express	Tulsa, OK
Federal Express	Memphis, TN
First Air	Dallas, TX
Grand Canyon	Grand Canyon, AZ
Great Lakes Aviation	Bloomington, MN
Gulfstream Int'l	Miami Springs, FL
Horizon Air	Seattle, WA
Island Air	Honolulu, HI
Mesa Air	Phoenix, AZ
Mesaba	Minneapolis, MN
Midway Airlines	RDU Int'l Airport, NC
North-South Airways	Atlanta, GA
Ozark Airlines	Columbia, MO
Pan Pacific	Mount Vernon, WA
Piedmont Airlines	Salisbury, MD
PSA Airlines	Vandalia, OH
Scenic Airlines	N. Las Vegas, NV
Seaborne Aviation	Christiansted, USVI
Servicios Aereos Litoral*	San Antonio, TX
Sedona (Aaron)	Seattle, WA
Shuttle America	Windsor Locks, CT
Skymark	Spokane, WA
Skyway Airlines	Oak Creek WI
Skywest	St. George, UT
Sunworld Int'l Airlines	Ft. Mitchell, KY
Tie Aviation	Jamaica, NY
Trans States	St. Louis, MO
Universal Airways	Houston, TX
Walker's Int'l	Ft. Lauderdale, FL

* RAA International Members