



**AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

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Docket Management System  
U S Department of Transportation  
Room Plaza 401  
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Subject: Docket No. RAA-2000-7587, Notice No. 00-08, NPRM -- Noise Certification Standards for Subsonic Jet Airplanes and Subsonic Transport Category Large Airplanes," and Draft Advisory Circular 36-4C -- Noise Standards: Aircraft Type and Airworthiness Certification

Ladies and Gentlemen:

The Air Line Pilots Association, representing the safety interests of 58,000 pilots flying for 50 airlines, has reviewed the subject Notice of Proposed Rulemaking and its associated Draft Advisory Circular.

We compliment the FAA and JAA for pursuing the harmonization of noise certification standards. We concur with both documents.

We would like to take this opportunity to confirm our stand that certification standards are the appropriate means of reducing noise. We want to reiterate our position that aviation noise reduction should be accomplished primarily through technological advances in engine and aircraft design/certification and not with the development of special pilot procedures.

Thank you for the opportunity to comment.

Sincerely,

John O'Brien, Director  
Engineering & Air Safety Department

JO'B:amr