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**AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

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February 28, 2001

US Department of Transportation Dockets  
Docket No. FAA-2000-7479 - 276  
400 7<sup>th</sup> Street NW  
Room Plaza 401  
Washington, DC 20590

01 MAR -6 10:11:45  
DEPT OF TRANSPORTATION

Subject: Proposed Advisory Circular (AC) 120-XX on Parts 121, 125, and 135 and Flightcrew  
Procedures During Taxi Operations

Dear Sir or Madam:

The Air Line Pilots Association (ALPA), which represents 59,000 pilots who fly for 49 US and Canadian airlines, has reviewed the subject Advisory Circular and offers the following comments.

General

We are generally pleased with the draft Advisory Circular 120-XX. It does provide valuable guidance which may be beneficial to improving airport safety. The section on aircraft conspicuity is particularly useful. However, while the AC addresses some important subjects such as Situation Awareness and verbal coordination requirements, the document lacks specifics. The recently published Advisory Circular 120-71, "Standard Operation Procedures for Flight Deck Crewmembers" with its multiple "Practical Example" appendices and checklist format is far more useful. Consideration should be given to revising the style of AC 120-XX or incorporation of AC 120-XX into the existing AC 120-71.

Specific

Page 2, paragraph 4a. Modify the first sentence to read: "The volume of air traffic has tripled since 1978. The FAA predicts that the number of airline passengers and air traffic will increase by nearly 60% by 2010. Many airports have expanded, creating increasingly complex runway and taxiway layouts."

Page 12, paragraph 8 Summary. Modify last sentence in the paragraph to read: "Runway incursions and surface incidents can be sharply reduced if the flight crew is properly trained and correctly accomplishes standard taxi operating procedures and practices."

Thank you for the opportunity to comment on this Advisory Circular.

Sincerely,  
  
Captain Mack Moore, Chairman  
Airport and Ground Environment Group

MM:as



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DEPT OF TRANSPORTATION

UNITED STATES OF AMERICA

February 28, 2001

US Department of Transportation Dockets  
Docket No. FAA-2000-7479  
400 7<sup>th</sup> Street NW  
Room Plaza 401  
Washington, DC 20590

Subject: Proposed Advisory Circular (AC) 91-XX on Part 91 Pilot and Flight Crew Procedures  
During Taxi Operations and Part 135 Single Pilot Operations.

Dear Sir or Madam:

The Air Line Pilots Association (ALPA), which represents 59,000 pilots who fly for 49 US and Canadian airlines, has reviewed the subject Advisory Circular and offers the following comments.

General

We are generally pleased with the draft Advisory Circular 91-XX. It does provide valuable guidance which may be beneficial to improving airport safety. The section on aircraft conspicuity is particularly useful. However, while the AC addresses some important subjects such as Situation Awareness and verbal coordination requirements, the document lacks specifics. The recently published Advisory Circular 120-71, "Standard Operation Procedures for Flight Deck Crewmembers" with its multiple "Practical Example" appendices and checklist format is far more useful. Consideration should be given to revising the style of AC 91-XX to a format similar to the existing AC120-71.

Specific

Page 12, paragraph 8 Summary. Modify last sentence in the paragraph to read:

"Runway incursions and surface incidents can be sharply reduced if the flight crew is properly trained and correctly accomplishes standard taxi operating procedures and practices."

Thank you for the opportunity to comment on this Advisory Circular.

Sincerely,

Captain Mack Moore, Chairman  
Airport and Ground Environment Group

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