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AIM AVIATION

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Our ref:

Your ref:

Date: February 8th 2002

The Docket Management System
US Department of Transportation Dockets
Room Plaza 401
400 Seventh Street SW
Washington
DC 20590-00001
United States of America

DEPARTMENT OF TRANSPORTATION
02 FEB 13 PM 12:42

Docket No. FAA-2001-11032; -20

Dear Sir or Madam,

14 CFR Parts 25 and 121 Amendment Nos. 25-106 and 121-288

Security Considerations in the Design of the Flightdeck on Transport Category Airplanes Final Rule; request for comments

AIM Aviation (Jecco) Ltd. is part of a group of seven trading companies located in Europe and the United States whose business is the design and manufacture of complete aircraft interiors and modifications to the interiors of certified aircraft. This includes design and manufacture of flightdeck doors, flightdeck bulkheads and flight crew rest compartments. This letter contains the consolidated comments from all UK based AIM Aviation companies upon the "Security Considerations in the Design of the Flightdeck on Transport Category Airplanes; Final Rule" dated January 10 2002.

AIM Aviation supports the introduction of new § 25.795 Security Considerations and the Amendment to Part 121, including the new § 121.313(j).

AIM Aviation's only comments refer to the new sub paragraph § 25.772 (c).

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AIM Aviation Comments on The Amendment

§ 25.772

(c) There must be an emergency means to enable a flight attendant to enter the pilot compartment in the event that the flightcrew becomes incapacitated.

1. The requirement, as stated in 25.772 (c), is contrary to the intent of the rest of Amendment 25-106 and 121-288 for the following reasons:
 - A. Persons that should be denied cockpit access can also use any mechanical means for non-forcible entry by a flight attendant.
 - B. Any hardware for opening a secured door from the passenger cabin side is potentially available for misappropriation by the persons to whom unauthorised access to the cockpit is intended to be denied. It is not possible to prevent a hardware (or hardware plus procedure) solution from being discovered by an assailant who is prepared to make lethal threats to the knowledgeable cabin crew.
 - C. We cannot envisage a safe and reliable means for cabin crew to determine that all the flight deck crew are all incapacitated from the outside a secure flight compartment. The only methods that we can imagine would test response of conscious flight crew and would therefore be intrusive and could be dangerous at critical flight phases.
 - D. In an event where all flight crew were incapacitated and a flight attendant gained access, in many instances it will not be possible to remove incapacitated flight crewmembers from the flight deck. There is no Part 25 requirement for incapacitated flight deck occupants to be readily removed from their normal stations by flight attendants and most cockpits do not have sufficient space around flight crew seats.
 - E. Should a flight attendant be able to safely gain access to a secure cockpit where all the flight crew are incapacitated, and at least one of the crew can be removed from the location of the flight controls, a catastrophe may still not be prevented unless the flight attendant is a qualified pilot for the aircraft type. Is this an unstated intent of the Amendment?

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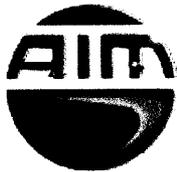
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2. We respectfully suggest that § 25.772 (c) is reworded, as it is not possible to comply with this requirement at the same time as: "Resist forcible intrusion by unauthorized persons..." specified in §25.795(a)(1).

May we suggest that the wording is revised to reflect the new requirement 121.313(j)(2) i.e.: -

"...establish methods to enable a flight attendant to enter the pilot compartment in the event that a flightcrew member becomes incapacitated."

3. AIM Aviation supports the new requirements in Part 121 to employ operator procedures to prevent incapacitation of a single flight deck crewmember from becoming catastrophic.

This concludes the comments of AIM Aviation (Jecco) Ltd. upon Docket No. FAA-2001-11032 Amendment No. 25-106 and 121-288, however AIM Aviation has some additional comments that we consider to be of a potentially sensitive nature, that are being sent separately by mail to the FAA, Office Of Rulemaking, ARM-1.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R John Heath', written over a large, stylized circular flourish.

R John Heath
Technical Director