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We are also concerned that the bulkheads that separate the cockpit from the cabin may remain vulnerable to attack. They should be made bullet proof with kevlar panels commonly used in military vehicles and helicopters. In addition, critical systems that may be vulnerable to damage by firearms should also be protected with similar measures. Now that air marshals have been deployed in substantial numbers, the next attempted hijacking may well involve gunfire in the cabin. The most critical aircraft systems must be protected from ballistic damage. An ARAC working group has already recognized the potential hazards involved and recommended action. We implore the FAA to act on these recommendations.

Doors and bulkheads isolate the cockpit from threats that may arise in the cabin. If there are to be no fortified doors on cargo aircraft, then it seems only reasonable that no one should be permitted to ride in the cabin of a freighter who would not be permitted to ride in the cockpit of a passenger aircraft. Without the new doors, the only way to insulate the cockpit from the threat is to keep anyone who might pose a threat off the aircraft. To do that, the only reasonable standard would be the same as that applied to those who seek access to the cockpit in flight. Without the new doors all those aboard a cargo aircraft have access to the cockpit. The current system of keys provides only the illusion of restricted access. Key accountability is weak or non-existent at most carriers. Many of the aircraft have been in service for decades with the same locks. At most airlines those same locks are fitted to the newest aircraft as well. At most carriers, one key will open the doors to every aircraft the carrier operates. Many former employees undoubtedly hold keys. This is a large number of people as the same keys and locks have been in use for a very long period of time. Those locks with their widely distributed keys and attached to flimsy doors provide no barrier to anyone determined to enter the cockpit.

Thank you for your consideration of these comments.

Sincerely,



Capt. Robert M. Miller
President, CAPA

RMM/bg

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