

Comments to FAA Office of Rulemaking:

In the Regulatory Evaluation Summary, Benefits and Costs section on page 2125, the Rule states that the incremental costs of a hardened flight deck door are \$3000; \$9000 for a hardened door versus \$6000 for a current door. Honeywell, as a supplier of the ballistic resistant material Spectra Shield, can address the raw material cost issue as it applies to cockpit doors. Door manufacturers have interest in different ballistic resistant materials depending upon their unique resultant designs that meet the NIJ Level IIIA ballistic and blunt force requirements set forth by the Rule. The ballistic material in raw form may add as much as \$1500 to the cost of the door depending on the size and design. Other cost items that need to be considered are:

- Door system R&D time and materials
- The cost of molding the ballistic materials into panel form
- The cost of molding the final door panel
- Processing and cutting the complete door panel for hardware mounting
- More robust hardware to meeting new design requirements
- Ballistic and Blunt force testing/certification
- Fast sensing differential pressure decompression sensors and control electronics to defeat door security systems and command the door to release and open in case of explosive decompression
- Modifying the current monument structure of the bulkhead
- Installation of the door

After working with several third party door manufacturers over the past several months, it is our understanding that the cost of a fully compliant door could cost twice as much as the upper limit of \$17000 as suggested in the Rule.

The Rule references an installed design that may have met the proposed requirements for \$12000 per airplane. It is our understanding that the particular solution has since been removed for performance reasons and the carrier has pursued other design options.

Now that the industry has been able to develop and test fully compliant cockpit door systems, we would encourage the FAA to revisit the costs associated with the design, development, and installation of those systems to insure the airlines are able to meet the requirements without causing further economic stress throughout the aerospace industry.