

Department Number
C8020
Northwest Airlines, Inc.
5101 Northwest Drive
St. Paul, MN 55111-3034



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Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street SW
Washington, DC 20590-0001

Subject: 14 CFR Parts 25 and 121: Security Considerations in the Design of the Flightdeck on Transport Category Airplanes

References: (1) Docket No. FAA-2001-11032
(2) AC 25.795-1 Flightdeck Intrusion Resistance
(3) AC 25.795-2 Flightdeck Penetration Resistance

Northwest Airlines has reviewed the Immediate Adopted Rule and offers the following comments.

Operating Requirements - Flightdeck Door Requirements page 2122 indicates that there is possible part 121 future rulemaking that would make flight deck doors mandatory on all-cargo aircraft. NW cargo aircraft do not currently have cockpit doors or even bulkheads. If this became a mandatory requirement it would be very expensive for NWA.

Benefits and Costs page 2125 states that the FAA has determined that the low end cost to procure and install doors is \$12,000 and the high end is \$17,000. It is a very low estimate. Further it requests that supporting documentation be provided that would show the actual cost of implementation. Finally, this section states that, without exception, every flightdeck door manufacturer claimed that their version of a secure door could be installed in an overnight. Airbus is now saying it will take 160 work-hours and four days of down time to install a secure door on their narrow body fleet.

Respectfully,

A handwritten signature in black ink, appearing to read 'Mark Millam'.

Mark Millam
Chief Engineer

cc: Rich Theisen
Dec Lee