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BEFORE THE
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WASHINGTON, D.C.

Security Considerations In The Design Of The Flight Deck On Transport Category Airplanes	)	FAA-2001-11032 -34 March 26,2002

MOTION AND COMMENTS OF ATLAS AIR, INC.

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March 26, 2002

MOTION FOR LEAVE TO LATE FILE AND COMMENTS OF ATLAS AIR, INC.

MOTION

In ***Security Considerations in the Design of the Flightdeck on Transport Category Airplanes,*** Docket No. FAA-2001-11032, 67 Fed. Reg. 2118 (January 15, 2002), the Federal Aviation Administration issued a Final Rule and a request for comments about cockpit door strengthening and replacement. While comments have been requested by March 18, 2002, the subject is exceedingly complex, and preparation of this response has required extensive internal coordination, delaying finalization until today. Accordingly, Atlas Air, Inc. respectfully requests leave to file its comments slightly after the due date. FAA consideration of them will advance the decisionmaking process without prejudicing interested parties.

COMMENTS

The following constitutes the comment of Atlas Air, Inc., regarding the Final Rule in *Security Considerations in the Design of the Flightdeck on Transport Category Airplanes,* Docket No. FAA-2001-11032, 67 Fed. Reg. 2118 (January 15, 2002), which would require reinforcement of aircraft cockpit doors to specified standards of resistance to small arms and shrapnel penetration. The Rule applies to all-cargo aircraft that had cockpit doors as of the date of publication, as well as to passenger aircraft. The deadline for implementation is April 9, 2003. It would not require placement of doors where none now exist, which is the case with many all-cargo aircraft, including Atlas Air's 747-400s, which were originally built as freighters rather than converted from passenger aircraft. The FAA indicates, however, that this issue will be revisited in a future rulemaking.

The Rule was issued in parallel with *Flightcrew Compartment Access and Door Designs,* Docket No. FAA-2001-10770, SFAR 92-3, 67 Fed. Reg. 2112 (January 15, 2002), which extends to all cargo aircraft that have doors installed a requirement for basic strengthening of the doors and installation of locking devices. Atlas is complying with that requirement. However, Atlas does oppose as unnecessary and unworkable the Rule in Docket No. FAA-2001-11032 insofar as it requires further reinforcement of cockpit doors in cargo aircraft. Atlas identifies alternative measures to serve the same end.

Conclusion:

The FAA's cost estimate of $12,000 to $17,000, including certification, seriously underestimates the expense of cockpit door reinforcement. Based on contacts with vendors Atlas Air believes the cost of reinforcing existing doors would approach $50,000 per aircraft. The cost of adding new doors would exceed $100,000 per aircraft.

The new, high stakes security environment requires all involved to think anew. It is important, however, to act with discernment as well as determination. Given much to do with limited public and private resources, remedies need to be relevant to and effective against newly perceived threats, to avoid waste and a false sense of security. Cargo airlines need to act, but in ways appropriate to their assets and operations, which differ in crucial respects from passenger carriers. The Congress has recognized this by providing for different treatment of cargo and passenger aircraft in the Aviation and Transportation Security Act, Pub. L. No. 107-71 (November 16, 2001)("ATSA"). The International Civil Aviation Organization also treats passenger and cargo aircraft differently, in particular as to regulation of cockpit doors.

The most important practical distinction for purposes of preventing a September 11, 2001 type incident is the simple reality that cargo carriers are not in the business of transporting strangers. Therefore, it is possible to screen thoroughly all persons having access to the aircraft, and to identify and affirmatively select the limited number allowed on board during flight. This, rather than requiring heavy investments in essentially superfluous cockpit doors, is the way effectively to guard against the risk of an in-flight seizure of an all-cargo aircraft.

The FAA should also consider differences among aircraft. In the case of the Boeing 747, there already is a door between the main deck and the upper deck. To the extent there is any risk that a potential hijacker could stow away among cargo pallets, this door effectively protects the cockpit and should be deemed sufficient. There is therefore no reason to interpose an additional reinforced door between the upper deck and the flight deck.

Finally, the FAA should make clear that to the extent modifications are required to all-cargo aircraft, they will receive the same financial reimbursement as is afforded passenger carriers.

Discussion.

I. Background – Atlas Air Operations

Atlas Air is an all-cargo airline with some scheduled and charter flights but predominantly engaged in operations for international airlines in which Atlas provides the aircraft, crew, maintenance and insurance ("ACMI" or "wet lease" operations) and the customer airline arranges for sale of the cargo capacity and provides cargo handling, fuel and associated costs.

Atlas Air's fleet consists of a total of 37 aircraft, all Boeing 747s – the world's largest fleet of 747 freighters. Of the total fleet, 25 are 747-200s or 300s, and twelve are 747-400s. Aircraft originally configured as freighters, including all of the model 400s, have curtains, rather than doors, between the upper deck and the cockpit, as do several of the 747-200s. A total of 21 of the aircraft, all 747-200 and 300s, have existing cockpit doors and so would be affected by the reinforcement requirement promulgated January 15, 2002. However, as projected by the FAA ***(see*** 67 Fed. Reg. 2122), Atlas recognizes the probability that if it concludes that reinforced cockpit doors are required on cargo aircraft that now have doors, the FAA is also very likely to conclude that externally distinguishable cargo aircraft presently without doors should also have them. Therefore this comment is applicable to both 747 models.

A particular feature of 747 freighters is the physical separation of the upper deck and cockpit from main and lower decks where cargo is carried. Although the precise

configuration varies among different aircraft in the fleet, access to the upper deck and cockpit is by means of a ladder. In the classics, the ladder leads up to a trap door that closes flush with the deck. In the 747-400s the ladder leads into a cubicle on the upper deck. In every case, there is an FAA type-certificated smoke door between the main deck and the upper deck.

Atlas carries a broad range of high value cargo including flowers, fish, computer or automobile parts, clothing, military supplies, and a variety of other goods. Generally the cargo is loaded on pallets made up by the shipper or freight forwarder. Atlas also carries cargo not suitable for palletization, such as racecars and live animals. As indicated, all cargo is carried on the main and lower decks.

The upper deck of Atlas Air's aircraft include, aft of the flight deck, a lavatory, a galley, a small number of seats, and a crew rest area. Atlas Air is authorized under 14 C.F.R. § 121.583 to carry certain specified classes of persons who, in Atlas Air's case, fall into well-defined categories. Because nearly all Atlas flights are of intercontinental range, it is common for flights to carry supplemental crewmembers, to allow completion of the flight within regulatory limits on duty hours. An Atlas Air flight instructor, check pilot or mechanic may be aboard. A government inspector may be present in the jump seat. An Atlas Air or contract loadmaster likely travels with the cargo. When live animals are carried their handlers likely will be included on the flight. Couriers may travel along with high value or sensitive cargo, or at the request of the customer. Finally, Atlas Air has a program in which its employees and their dependents, after suitable training, may travel on Atlas aircraft. However, because of space and seating limitations, the total number of people on board, including crew augmentation, may not exceed eight.

11. In the Wake of September 11, 2001, Far-reaching Steps Are Being Taken To Address Terrorist Threats Involving Cargo Airlines.

Unquestionably the events of September 11, 2001, have transformed the way the world thinks about airline security. Virtually all past planning regarding terrorism had concentrated on risks within the realm of prior experience – bombs smuggled aboard passenger aircraft, as in the Lockerbie bombing, or hijackings to hold passengers hostage to leverage concessions such as diversion of the flight or release of prisoners. September 11 forced an entirely new focus, on the reality that a fully fueled aircraft can be a horrifically effective bomb.

Given the historic focus on protecting passengers, cargo aircraft had been largely exempt from concerns about terrorism. No longer. It is clear that a fblly fbeled cargo aircraft could be every bit as devastating as a passenger plane to a densely populated or high value target on the ground. Indeed, some would argue that in the wake of September 11, with airline passengers as well as cabin crews newly alert to any threat to the cockpit, a potential suicidal hijacker might regard a large cargo aircraft as the weapon of choice.

As a result, all-cargo carriers have been centrally involved in the new airline security environment. **A** number of security enhancements exclusive of cockpit door adjustments either have been adopted or are in the process of strengthening following September 11, 2001, in several key areas:

Security of aircraft: On September 11, Atlas and other U.S. all-cargo carriers were grounded, along with passenger carriers, by order of the Secretary of Transportation. **As** a condition of resuming operations on September 14, a series of

security measures relating to the aircraft itself were adopted, including steps to secure the upper deck, searches of all cargo compartments prior to loading, and posting of security guards whenever the aircraft is accessible and supervised activity is not underway. Since then Atlas has taken further steps to ensure that unauthorized personnel do not have access to aircraft on the ground.

Screening of personnel: Additional actions prior to resumption of operations concentrate on personnel boarding the aircraft. Provision is made for identification of all occupants of the aircraft prior to departure, and for screening each crewmember and occupant with either a pat down or hand-held metal detector on flights to, from or within the United States. Under Atlas Air procedures, the pilot in command of the flight must be satisfied as to the identity and authority of any individual seeking to travel on the flight, and has the discretion to exclude anyone from the flight. Under recently published Transportation Security Administration regulations, *Security Programs for Aircraft 12,500 Pounds or More*, Docket No. TSA-2002-11604, (February 19, 2002), the Transportation Security Administration has provided for a new "Twelve-Five Security Program" for operators of aircraft with a certified maximum takeoff weight of at least 12,500 pounds, which includes a requirement for criminal history record checks, including fingerprint-based checks.

Security of Cargo: The Aviation and Transportation Security Act, Pub. L. No. 107-71 (November 16, 2001) (ATSA) mandates a system "as soon as practicable" designed to "screen, inspect, or otherwise ensure the security of all cargo that is to be transported in all-cargo aircraft." Among the recognized steps for addressing this issue is the "known shipper rule," which establishes procedures for verifying the reliability of the

source of cargo, to inhibit loading cargo from untrustworthy sources. Further measures in this area are expected in the future. These, however, likely will be tempered by the reality that physical screening of all cargo is a practical impossibility because the equipment does not exist and, moreover, unquestionably will, as more such equipment is produced, go first to passenger terminals as a matter of highest priority. Further steps should also be moderated by the realization that a terrorist intent on blowing up a vehicle through an implanted device, as distinct from attempting to use it as a bomb, would be exceedingly unlikely to select a cargo aircraft -- if he concluded that the security for passenger aircraft made the risk of detection too high, he would likely look not for some other, thinly-populated kind of aircraft but for a train, subway, bus or other carrier of large numbers of people.

Industry and government are working on further enhancements in these areas. Prior to formation of the Transportation Security Administration, the FAA had initiated an All-Cargo Carrier Aviation Security Contingency Plan, with specified procedures and restrictions to be implemented depending on the alert level in place at the time, as well as a number of special categories. Under the auspices of the Cargo Airlines Association, the major U.S. all-cargo carriers are refining design of a program for intensified measures of protection geared to the alert levels established by the U.S. Government, as well as examining the issue of cargo screening. Under Docket No. TSA-2002-11604, cargo airlines are subject to a requirement to have in place a security program approved by the Transportation Security Administration no later than June 24, 2002.

In short, since September 11, 2001, a number of far-reaching steps have been taken, and others are in process, to identify and address the terrorist possibilities applicable to the air cargo industry.

III. The Congress Has Recognized Differences Between Passenger Carriers and Cargo Carriers, Specifically As To The Cockpit Door Requirement.

That said, there still are distinctions among the types of threats passenger airlines and cargo airlines must address. Congress has explicitly recognized this in the ATSA by applying different rules and timetables to passenger carriers and cargo carriers. The Act, for example, sets a date for screening of all cargo on passenger carriers, but specifically does not do so for all-cargo carriers. ATSA § 110(f). Of even more direct relevance here, Congress mandated rigid doors only for "aircraft engaged in passenger air transportation or intrastate air transportation that are required to have a door between the passenger and pilot compartments under title 14, Code of Federal Regulations." ATSA, § 104. That provision includes no requirement that all-cargo aircraft have cockpit doors, and most cargo aircraft do not have them. So it must be understood that the Congress explicitly considered whether and where reinforced cockpit doors should be required, and consciously exempted all-cargo aircraft from that requirement.[1]

This does not mean that Congress was indifferent to the possibility of terrorism involving cargo aircraft. It manifestly does mean, however, that Congress understood that the terrorist threat applies differently to cargo and passenger airlines, and so intended to treat them differently.

[1] Atlas recognizes that the FAA is not relying on a Congressional mandate, but is instead proceeding on its own authority to require reinforced cockpit doors on all-cargo aircraft. This is spelled out in rulemaking notice at **67** Fed. Reg. 2114.

IV. Application of The Cockpit Door Requirement Would Be Inconsistent With New Standards of International Aviation Authorities.

In the wake of September 11 the International Civil Aviation Organization (ICAO) has undertaken efforts comparable to those in the United States to devise rules, procedures and design standards to guard against a recurrence, as well as to protect against other potential terrorist threats. In doing so, however, the ICAO has drawn a line between passenger and cargo aircraft very similar to that recommended in this comment. *See* Convention on International Civil Aviation, December 7, 1944, 61 Stat. 1180, TIAS No. 1591, 15 UNTS 295, Annex 6, Part 1, Chapter 13, ¶ 13.2.1, as adopted by a vote of the Council on March 16, 2002.

Specifically, the Council adopted a recommendation for "all aeroplanes which are equipped with a flight crew compartment door," placement of a door that is "capable of being locked," and for means by which the flight crew can be notified of suspicious activity or security breaches in the cabin." *Id.*, ¶ 13.2.1 This essentially tracks the U.S. requirement absent the addition of reinforced doors. However, Council separately recommended that after November 1, 2003, all "passenger-carrying aeroplanes" beyond 45,500 kg take-off mass or 60 passenger seating "shall be equipped with an approved flight crew compartment door that is designed to resist penetration by small arms fire and grenade shrapnel, and to resist forcible intrusions by unauthorized persons." *Id.*, ¶ 13.2.2. The ICAO recommendation on small arms and shrapnel resistance are specifically limited to passenger aircraft. If the U.S. Final Rule under consideration here is implemented as to cargo aircraft, it will be in conflict with the ICAO position.

As a party to the Convention on International Civil Aviation, the U.S. has undertaken to comply with ICAO standards and recommended practices. Extension of

the cockpit door reinforcement requirement to all-cargo aircraft unnecessarily risks having inconsistent standards applicable to U.S. aircraft and those from other ICAO countries authorized to operate to and from the U.S.

V. The Most Effective Defense Against Terrorism Is Denial of Access to the Flight, And In the Air Cargo Industry It Is Also Feasible.

A reinforced cockpit door is a single-purpose structure, having as its sole function preventing an intruder from entering into the cockpit and gaining control of the aircraft.[2] The requirement presupposes than the intruder has gained access to the aircraft in flight. It follows that denial of that access is a far more effective defense.

Moreover, in the case of all-cargo aircraft, it is a feasible defense. In the aftermath of September 11, 2001, for passenger carriers, even though existing doors have been strengthened and fitted with locks, further reinforcement is a high priority, because such carriers are in the business of transporting planeloads of *strangers* – people generally unknown to the airline until they reserve the seat, and unknown to the crew until they board the aircraft. With literally millions of passenger boardings daily, no one has yet been able to provide an assurance that passenger screening will be 100 percent effective. Therefore a strong physical barrier at the cockpit entrance is prudent.

But cargo airlines are in an entirely different business, transporting not people but goods. On such aircraft, because numbers of persons are limited, comprehensive identification and screening can be accomplished without disrupting flight schedules. Most importantly, strangers can, in fact, be reliably excluded, for their presence, instead

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[2] For fair analysis it is important not to confuse different types of threats. Cockpit security procedures defined in the Rule are irrelevant to certain dangers such as, for example, smuggling an explosive device into the cargo hold. Whether or not such a scenario is a significant probability, a secure cockpit would be of no consequence whatsoever in making it less likely.

of being the norm, stands out as a violation of the norm. Captains of cargo airlines need have no inhibitions about excluding suspicious people, because the carriers' revenues do not depend upon having strangers aboard.[3]

Precisely because of the nature of their business, it is logical to consider cargo aircraft as a low probability target for a September 11 suicide-hijacking scenario. Notwithstanding more intense screening of airline passengers, and the deterrent and preventative effect of alert cabin crews and other passengers, terrorists still are likely to judge that they can more readily escape detection in an aircraft filled with people unknown to each other and to the crew than they can in an aircraft where even a single stranger stands out. The greater probability is that tightened airport and aircraft security will drive determined, suicidal terrorists to other devices and other, more vulnerable targets.

But to the extent that this scenario is a risk, the best defense is the one that works – to screen scrupulously all personnel who seek to be aboard any all-cargo aircraft during flight, and to routinely exclude anyone as to whom the pilot in command has the slightest doubt. All-cargo airlines can ascertain with a high degree of confidence specifically who is on-board the aircraft when the doors are closed, and whether there is any reason to believe they represent a threat. Focusing on excluding unauthorized persons serves the

[3] The Rule under consideration here also tightens up access to the flightdeck as regulated by 14 C.F.R. 121.547(a)(3). Previously only the permission of the pilot in command was required; under the new rule, the certificate holder and the Administrator will also have to approve. See 67 Fed. Reg. 2127-28 (January 15,2002).

dual purposes of preventing individuals from planting bombs in the cargo hold and keeping hijackers out of the cockpit.[4]

That is the approach Atlas Air recommends. And it renders unnecessary both the further reinforcement of existing cockpit doors and the addition of cockpit doors where they do not now exist.[5]

VI. A Cockpit Door Requirement for All-Cargo Aircraft Is Operationally Unworkable And Economically Burdensome.

As noted above, the cockpit door is relevant only if the potential terrorist has gained access to the aircraft and is immediately on the other side of the door from the flight crew. Then the door is fully effective only if the door is kept secure for the duration of the flight – otherwise the intruder can simply wait until the flight crew opens the door to make his move.

But for operations such as Atlas Air's, keeping the door secure for the duration of the flight is physically impossible. Cargo flights on wide bodied aircraft are invariably long haul flights; hence, crew need to open the cockpit door during flight for access to the galley and lavatory, as well as to mitigate the health risks of sitting long hours in the same position. Therefore, unless the upper deck is entirely reconfigured to move those facilities inside an extended cockpit area, stronger doors simply will not protect reliably against an intruder already present on the upper deck. Where passenger aircraft can

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[4] As noted above, Atlas Air has complied with the requirement that existing cockpit doors be strengthened and fitted with locks. Therefore, as to those aircraft. an intruder would have difficulty breaking into the cockpit, and could be overpowered by other personnel on board – additional flight crew, loadmaster, etc.

[5] Atlas has also reviewed additional defensive steps the flight crew might take. An intruder would be a danger by leaving his seat, at which point he would be without the protection of a seat belt or supplemental oxygen. Maneuvering the aircraft in such a way as to incapacitate the intruder would be possible, but dangerous to the airframe. Rapid deliberate decompression would also be possible?but would be effective in disabling the intruder only at altitudes above 20,000 feet. Under the right circumstances?the flight crew might decide to pursue these steps, but it is neither necessary nor advisable to rely on them as a matter of practice.

arrange signals between the cockpit and cabin crew to allow safe opening of the door as needed, such procedures are not available for cargo carriers.

Moreover, because of their duration, virtually all Atlas Air flights are augmented with additional crewmembers. To stay within permitted duty hours, a 747-200/300 needs five total crewmembers, and a 747-400 needs three. The cockpit door has to be opened when relief crewmembers take the controls, and accordingly there also has to be access between the crew rest area and the cockpit.

These unavoidable operational necessities would nullify any perceived benefit of the cockpit door requirement.

The insertion of a rigid cockpit door also poses distinct safety issues. It would, for example, preclude access to the cockpit from the outside in the event of crew incapacitation or other emergency, and would complicate the ability to equalize pressure in the case of rapid depressurization of the aircraft. These problems are not insurmountable, but they do underscore that the requirement should not be imposed where the necessity is unclear.

Finally, the FAA estimates of the cost of reinforcements – between $12,000 and $17,000 per aircraft – are not consistent with Atlas Air's information. Vendor prices for the upgraded door range from $25,000 to $40,000 – for aircraft that already have doors. Boeing's proposed upgrade is priced at $39,000 per aircraft. One passenger airline is spending $49,000 per flight deck door -- $39,000 material and $10,000 labor – on widebody replacements supplied by Boeing. Atlas as yet has no firm proposals for adding the bulkhead and door structure for aircraft presently without doors, but anticipates a cost of more than $100,000 apiece.

Notwithstanding that aviation security is the highest priority, the supply of funds for this purpose, public and private, is still finite, particularly in light of the lasting economic impacts of the September 11 attacks. Therefore, it is imperative to invest wisely, moving most aggressively on steps that will make authentic contributions to the goal of deterring and preventing further transformations of aircraft into instruments of terror. Reinforced cockpit doors on all-cargo aircraft do not meet that standard.

VII. The Configuration of Boeing 747 Aircraft Provides the Option of Isolating The Upper Deck From The Remainder of the Aircraft.

As noted, Atlas Air believes that in the case of all-cargo airlines the proper and most promising focus for addressing the threat cockpit doors are meant to answer lies in thorough passenger screening and strict control of access to the aircraft. However, it is not inconceivable that an intruder could stow away in the cargo, perhaps in a crate, and then seek to gain control of the aircraft once it is airborne. In addition to improved steps to maintain the security of the cargo as described above, Atlas urges consideration of a 747-specific alternative that could address this possibility.

As noted above, all models of the Boeing 747 already have a smoke door that isolates the main deck from the upper deck. These doors typically are about one-half inch think, and are not designed to resist ballistic or fragmentation penetration. However, the smoke door could be reinforced to meet Federal standards, and provision could be made to keep it secure in flight.[6] Because that door is part of the safety equipment of the aircraft, it is likely that a Supplemental Type Certificate and/or an Alternate Means of

[6] An alternative approach would be to modify the ladder leading from the main deck to the flight deck so it could be folded up and locked from above during flight. However, this could pose a safety concern in that it would impede quick access from the upper deck to the main deck in case of a need to attend to problems with the cargo or to evacuate the aircraft. Atlas therefore would prefer reinforcement of the **smoke** door, in a manner that would still permit the existing degree of access from above.

Compliance would be required to authorize this change. It would, however, be a reasonable alternative means to meet the objectives of the Rule under consideration here.

This approach would also be consistent with the Rule's approach to crew rest areas on passenger aircraft. Specifically, the FAA explanation states that:

> Some airplanes are equipped with crew rest areas that have doors that lead from the passenger cabin into the crew rest area – as well as a door from the crew rest area into the flightdeck. For the purposes of compliance with this amendment, the door leading into the crew rest area from the passenger cabin is the affected door.

67 Fed. Reg. 2120. Similarly, reliance on the existing smoke door on 747 aircraft, appropriately reinforced, would incorporate the crew rest area into the same protected area as the cockpit, and take into account for all-cargo aircraft the same practical operational necessities the Rule recognizes for passenger carriers. Given strict screening of all personnel aboard the aircraft, Atlas Air does not believe this change is necessary However, from perspectives of operations, costs and safety, it is far preferable to the requirement for a reinforced cockpit door.

VIII. The FAA Should Make Clear That Any Mandated Reconfigurations Of Cockpit Doors Are Reimbursed For Cargo Carriers As Well As For Passenger Carriers.

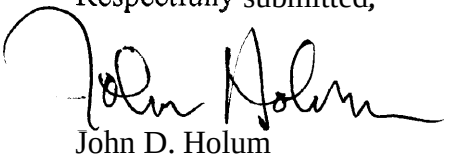
In SFAR 92-2 (November 21, 2002), the FAA authorized modifications to flight deck doors. It has also provided that passenger airlines making such modifications would be reimbursed. ***See*** FAA announcement ***"EnhancedAircraft Security Program,"*** (February 7, 2002), stating that "funds are authorized to assist air carriers" in implementing, among other things, "design changes that improve the flightcrew compartment door installation to restrict the unwanted entry of persons...", but specifying eligibility to include entities that conduct "operations under part 121 as

passenger carrying operations…". Although the Rule under consideration here proposes to extend the mandate for cockpit door reinforcements to all-cargo carriers, there has been no parallel action to clarify that reimbursement will extend to all carriers, including all-cargo carriers, who are required to take on this additional burden.

Atlas Air is among airlines still reeling from the economic impact of the September 11, 2001 terrorist attacks. Fairness demands that all-cargo carriers be compensated on the same basis as passenger carriers for cockpit door improvements or other security-related changes carried out under government mandate. This principle will apply with particular force in case the government requires the addition of cockpit doors where none now exist, which will entail dramatically higher costs per aircraft.

WHEREFORE, Atlas Air, Inc., urges the Federal Aviation Administration to modify the Final rule in the captioned proceeding to exclude all-cargo aircraft from the requirement to meet small arms fire and shrapnel penetration. In the alternative, Atlas urges the FAA to specify that as to Boeing 747 all cargo aircraft, the smoke door between the main deck and the upper deck may serve as the door to be reinforced under the rule, and to authorize such modifications. Finally, Atlas urges the FAA to make clear that cargo carriers are eligible for reimbursement for any such modifications required to be made either to cockpit doors or to smoke doors.

Respectfully submitted,



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