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DEPT. OF TRANSPORTATION

AIR TRANSPORT ASSOCIATION

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March 18, 2002

Dockets Management System,
Department of Transportation Dockets,
Room Plaza 401,
400 Seventh Street SW,
Washington, DC 20590-0001
Attention: Docket No. FAA-2001-11032

-32

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

Ladies/Gentlemen:

FAA has issued and requested comments on a Final Rule that amends 14 CFR Parts 25 and 121 regarding Security Considerations in the Design of the Flightdeck on Transport Category Airplanes. This amendment requires a means to protect the flightdeck from unauthorized intrusion and small arms fire or fragmentation devices. The FAA is also requiring a retrofit of certain airplanes operating in part 121 service to comply with this amendment.

Our members generally support the requirements of the rulemaking. However, as indicated in the attached comment from one member, the cost analysis contained in the rule significantly underestimates the actual cost of the replacement doors. Additionally, since the new doors provide adequate protection, similar modifications for the bulkheads, floors and ceilings are not justified on a retrofit basis. From an industry perspective, we support these observations and recommend that the rule be modified as necessary to take these issues into account.

Your serious consideration of these comments would be greatly appreciated.

Sincerely,

Charlie Bautz

Director, Operational Engineering

Attachment

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ATTN: Charlie Bautz - cbautz@air-transport.org

REF: FAR Memo No. 2002-AE-003

Subject: 14 CFR Parts 25 and 121 - Security Considerations in the Design of the Flightdeck on Transport Category Airplanes - Immediate Adopted Rule.

FAR memo no. 2002-AE-003 requests comments concerning security considerations in the design of flightdeck doors and the accompanying rule that has been adopted. American Airlines is proceeding with plans to modify its aircraft and offers only two comments.

The estimated purchase and installation costs for complying with the new rule are low. Where the FAA has estimated an upper limit of \$17,000 American is spending up to \$49,000 per flightdeck door (\$39,000 material and \$10,000 labor) on its widebody replacements that are being supplied by the Boeing company. Our narrowbody replacement doors, being supplied by C&D Aerospace, also exceed the FAA's upper limit at \$35,000 (\$25,500 material and \$10,000).

American does not feel that further rules, similar to what has been adopted for the flightdeck door, are needed for the bulkheads, floors and ceilings on a retrofit basis. With new doors installed the flightdeck will have a high level of security. Since it is not the intent to make the flightdeck impenetrable, but rather to deter and delay attempts at unauthorized entry and provide a high level of protection, the new doors are adequate.

Regards,
Dennis Zvacek for Mark Boes
Director
Aircraft Engineering