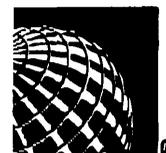


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**Continental
Airlines**



Continental Airlines, Inc.
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26 March 2002

U.S. Department of
Transportation Dockets
400 7th Street, SW Plaza 401
Washington, DC 20590

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Subject: Comments to Docket No. FAA-2001-11032; Amendment No. 25-106 - 36
and 121-288

This correspondence provides comments to Docket Number FAA-2001-11032, Security Considerations in *the* Design of the Flight Deck on Transport Category Airplanes. Continental Airlines concurs that the security for the flight compartment must be enhanced to provide a high level of protection against unauthorized entry, and we are in the process of finalizing the design concepts for the incorporation into our airplanes. However, Continental Airlines has several comments regarding the ruling.

With approximately twelve months remaining to comply with the Phase II requirement, Continental Airlines is concerned that currently there are no approved designs for the flight deck door available. The 09 Apr 2003 deadline required by the ruling is very aggressive, considering the amount of airplanes that will have to be modified, but Continental Airlines believes it is an achievable deadline. However, as aggressive as we are in pursuing this deadline, Continental Airlines recommends the FAA commit to an aggressive schedule in approving new flight deck door designs in order to allow Continental Airlines and the industry to meet this goal. One of the suppliers has proposed to have qualified DER's approve test reports for decompression, loading (blunt force), flammability, etc. It is also recommended the FAA establish DER's for ballistic approval tests to be conducted for the doors.

Continental Airlines is also concerned with the per-airplane cost estimate as defined in the ruling. Continental Airlines believes \$12,000 to \$17,000 estimate does not reflect the true costs to modify each airplane to meet the current and future requirements. Up to this point, including the costs for Phase I, Phase II, and training requirements, Continental Airlines estimates that the per-airplane cost for the flight deck door will be between \$20,000 and \$26,000. This cost estimate considers weight increase but does not consider additional spares, the Maintenance Program changes, and additional training required for the Phase II door. Continental Airlines believes the door is an excellent security

enhancement but we feel the FAA should reconsider the cost estimate to reflect the true costs associated with this mandate.

If you have any question regarding this matter please feel free to contact this office-

Sincerely,

CONTINENTAL AIRLINES, INC.



**Gerald J. Johanson
Managing Director
Quality Assurance**