

June 13, 2002  
B-H300-02-JGD-050

Docket Management System  
Docket No. FAA-2002-11705  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh Street, SW.  
Washington, DC 20590-0001

Subject: Comments to Docket FAA-2002-11705, Notice of Petition for Rulemaking, Request for Comments; Regarding Appendix M to 14 CFR Part 121, and Appendix E to 14 CFR Part 125; Petitioner: Airbus Industrie

Reference Boeing letter B-H300-02-JGD-041, dated May 22, 2002

Dear Sir or Madam:

Enclosed are comments from Boeing Commercial Airplanes concerning the subject petition for rulemaking that was submitted by Airbus Industrie. We appreciate the additional time afforded us for formulating our response, as requested in our referenced letter of May 22, and trust that the FAA will consider these comments when it makes its final decision concerning the petition for rulemaking.

Please direct any comments or questions to Ms. Jill DeMarco of this office at (425) 965-2015.

Sincerely,

**Original signed by**

Jim Draxler  
Director, Airplane Certification and Regulatory Affairs

Enclosure

**Comments from  
Boeing Commercial Airplanes  
to Docket FAA -2002-11705**

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In its petition for rulemaking, Airbus has requested a revision to the resolution of the following parameters specified in 14 CFR §121.344(a):

- parameter 83 (cockpit trim control input position - roll),
- parameter 84 (cockpit trim control position - yaw), and
- parameter 88 (all cockpit flight control input forces - control wheel, control column, rudder pedal).

With these requested revisions, Airbus airplanes would not need to install certain modifications to comply with the current requirements of 14 CFR §121.344.

Boeing concurs that the requested revisions to the parameter 83 and parameter 84 resolutions are minor and would not significantly affect the ability of accident investigators to perform their investigation. However, Boeing questions the need to revise the accuracy requirement for parameter 88.

In general, the Boeing design for the rudder pedal system is similar to the Airbus design. As we have discussed with both the FAA and the National Transportation Safety Board (NTSB), the rudder pedals in Boeing airplanes can be adjusted to accommodate the height of the pilot, and the force data can vary with respect to the position of the pedal. However, Boeing has not attempted to address this with respect to accuracy requirements. The Airbus interpretation of parameter accuracy appears to be total system or end-to-end accuracy. Boeing does not agree with this interpretation, and notes that the term "Sensor Input," as stated in the "Accuracy" column in Appendix M to 14 CFR Part 121, does not support Airbus' interpretation of total system accuracy.

Boeing's interpretation had been discussed with the FAA and NTSB during the development and certification of parameters to comply with parameter 88 of §121.344. Both the FAA and NTSB concurred with Boeing's interpretation of accuracy as being applicable to the sensor only. Boeing suggests that it would not be appropriate to make changes to the regulations to address issues related to this item, as we have already implemented on multiple Boeing airplane models a force parameter recording scheme that is based on the previously agreed-upon interpretation.