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December 17, 2002

Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, DC 20591
Attn: Tom Penland
AFS-220

Subject: FAA Guidance Relative to Flight Deck Door Design and Door Un-Locking Policy; Smaller Transport Category Airplanes

Dear Mr. Penland:

ALPA has reviewed the subject policy letter and would like to provide some comments for your consideration.

The Enhanced Flightdeck Security Final Rule, FAA-2001-11032, dated January 15, 2002 requires that, in the event of a single flight crew member incapacitation, there be a means for a cabin crewmember to gain access to the cockpit to assist the remaining flight crew member (25.772(c)). The policy letter allows provisions for flight crew members operating smaller aircraft with enhanced cockpit doors to slide aft in their seat, loosen their harness and unlock the cockpit door (provided the flight crew member is able to reach the flight controls in the event of an uncommanded aircraft upset). It is envisioned that this flight crew maneuver will satisfy the requirements of FAR Part 25.722(c) in the event that one flight crew member becomes incapacitated and the assistance of a cabin crewmember is required on the flightdeck.

It is ALPA's understanding that Transport Canada has taken a different position on the door-unlocking issue on smaller aircraft and has decided to classify the door lock as a "Cockpit control" which must meet the requirements of FAR Part 25.777 (525.777 in Canada). Both solutions (manual unlock versus remotely activated) present their own unique problems that we feel must be addressed.

In the situation of a flight crew member moving out of position to unlock the cockpit door, there are some additional criteria that must be considered. For example, geometry should not be the only criteria. The subject Policy letter states; *"In this situation, a successful test/demonstration could be shown by allowing the non-incapacitated pilot to move or slide his/her seat back to a point where it is still possible to maintain control of the airplane (has the ability to grasp the yoke). It is not necessary that the person maintain their feet on the rudder pedals at this point."* The crewmember must be capable of maintaining control of the aircraft in all areas of the flight envelope. In certain situations where a flight crew member is incapacitated, use of full control authority may be necessary by the remaining flight crew member. In addition, there may be a situation where the incapacitated flight crew members' position may be affecting the aircraft controls. The FAA Aircraft Evaluation Group (AEG) must take these extreme flight control deflections or levels of upsets into account when granting approvals for type designs at the various operators based upon the criteria of the subject policy memo.

In the situation in Canada where a remote unlock mechanism will be installed in the cockpit to allow the flight crew member(s) to unlock the cockpit door from their flight position, a future training and fleet compatibility issue will arise. It is ALPA's understanding that Transport Canada will eventually mandate a remote unlock mechanism be installed in the cockpit on all newly manufactured aircraft as well as all aircraft registered in Canada. This installation presumably will also include a cockpit indication to alert the flight crew if the door is not locked properly. For those operators in the United States, future new aircraft may be configured differently than those currently being operated. Therefore, we must keep in mind that an operator's fleet of aircraft may be mixed. Although this will not present a serious safety issue, it will introduce aircraft training and documentation differences that will need to be addressed.

ALPA's position has consistently been that the flight crew must have a means to positively identify the individual requesting access to the cockpit and the ability to monitor the area on the cabin side of the cockpit door. This must be provided to ensure that the area around the cockpit door is clear of unwanted individuals prior to opening the door. Neither the subject policy memo nor the solutions above (manual or remote locking capability) account for this identification to take place. ALPA continues to support the need for some sort of visual monitoring system.

ALPA recommends the following:

1. AEG type certificate evaluations must ensure that the crewmember must be able to manually control the aircraft in all areas of the flight envelop while unlocking the door.
2. Enhanced cockpit door approvals and installations continue per the April 2003 deadline.
3. Once a remote unlocking mechanism design is approved, the FAA should consider that design to be the standard for deliveries to US operators, with a phased retrofit installation program to ensure fleet commonality and operational safety in extreme upset situations.
4. The FAA should modify the subject policy memo to include provisions for positive verification to the flight crew of who will be gaining access to the flightdeck.
5. The FAA should continue to develop rulemaking language to require a means for flight crew monitoring of the cabin side of the cockpit door.

Thank you for the opportunity to comment.

Sincerely,

Dennis J Dolan

Captain Dennis J. Dolan
First Vice President