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FAA-02-12261-77

R.V.S.M.

DEPT OF TRANSPORTATION

02 DEC 30 AM 11:50

To whom it may concern,

The reduced vertical separation minimum (R.V.S.M) (FAA-12261) was introduced into the (N.P.R.M.) or notice of proposed rulemaking on May 10, 2002. This N.P.R.M. suggests a reduction in the minimum vertical separation of aircraft that are flying at or above flight level 290. This change would affect aircraft operating between flight level 290 and 410, by reducing the minimum vertical separation from 2,000 feet to 1,000 feet. The FAA has implemented this change to make air traffic at these altitudes more time and fuel-efficient. In my opinion flight safety becomes a factor when you introduce this R.V.S.M.

Time and fuel efficiency are arguable factors in this R.V.S.M., but does the dollar bill make it acceptable to compromise flight safety? Not to mention that by reducing the separation and making six new cruising altitudes creates a strain on air traffic controllers. What happens if separation errors occur

where do you put aircraft that are stacked on top of each other and only have 1,000 feet vertical separation?

Another concern for flight safety is the efficiency of altimeters and autopilots at these altitudes. The FAA has projected \$5.8 billion dollars in fuel savings from 2004-2018, which are extraordinary savings. On the other hand aircraft have to be upgraded with TCAS-2, autopilot, and altimeter instruments, in-order to fly using new R.V.S.M. standards. This is relatively expensive especially for corporate type jets that include business, charter, air taxi, and smaller private planes that have been in service for years. It does not make sense to re-equip old aircraft with instruments that are worth more than the plane itself. The FAA projected that it would cost \$634 million for "U.S. operators" to upgrade all aircraft.

I don't want to come across as though I'm attacking the FAA; I'm only trying to convey my feelings on this R.V.S.M. I do not believe that the U.S. airspace or the air traffic control system is ready for a change of this magnitude.

From a concerned aircraft passenger,

Brian C. Stoner
