KALITTA AIR

January 24, 2003

U.S. Department of Transportation
Docket Management System
400 7th Street SW.
Room PL 401
Washington, DC 20591-0001

DOCKET #:FAA-2001-11032; Amendment 25-106 and 121-288

PETITION FOR EXEMPTION to 121-313(j), (part of 121-288)

Kalitta air is a supplemental air carrier authorized under § 14CFR 121, to carry cargo only.

We are requesting an exemption to § 14 CFR 121.313 (j). The relief requested is:

- Removal of the cockpit door for fleet standardization.

Kalitta Air currently operates 7 B-747s and 3 B-727s. Only 1 aircraft in the fleet is affected by this rule (N705CK, B-747-246F). This aircraft was delivered by Boeing, with a cockpit door. The B-727's do not have seats aft of the door.

All of the other 747's have been converted from PAX to Freighter and have had the doors removed as part of the conversion. Boeing has delivered "new build" 747 freighters with and without cockpit doors which would mean that the doors were offered as "optional equipment" (not part of original type design).

We are currently following all of the new rules regarding who can occupy flight deck seats and have applied this requirement universally to all aircraft in our fleet. Installation of a reinforced cockpit door on this aircraft would cause an enormous burden on Kalitta Air, initial contact with Boeing indicated that this door system would cost approximately $ 200,000. A large portion of this expense is due to "non-recurring engineering costs" and the burden having to be shared with so few operators requiring this door.

818 Willow Run Airport, Ypsilanti, MI 48198
Telephone 734-484-0088
Fax 734-544-7044

KALITTA AIR

The typical mission crew for our B-747's consists of an operating crew (Captain, First Officer and Flight Engineer), Flight Mechanic and Loadmaster. Additional occupants of the aircraft could be additional crewmembers (either deadheading or heavy crew), or individuals allowed under § 121.583 AND authorized in writing by the FAA, DTW FSDO. Kalitta Air is confident that the crew composition and restricted access to our aircraft is sufficient to preclude the aircraft from being used as a weapon.

If additional information is required please contact me at (734) 484-0088 or FAX (734) 544-7044.

Thank You,

Mark J Guyon
Director of Maintenance
Kalitta Air LLC

SUMMARY OF EXEMPTION REQUEST

Kalitta Air LLC is a part 121 supplemental air carrier that has one B747 freighter that has a flightdeck door. Kalitta Air is requesting an exemption from § 121.313 (j) to allow the carrier to remove the door for fleet standardization.