

Alaska Airlines requests a minimum of a 30 day extension for comments, and 60 days would be better. The NPRM document contains numerous flaws that are at odds with, and contradict, recently enacted FAA Advisory Circulars AC120-28D, and AC120-29A. If this NPRM is adopted as it stands it will be inconsistent with these painstakingly created AC's that have been developed over a period of several years as harmonized documents between the FAA and JAA in Europe. This NPRM will set the aviation industry back 5 to 10 years and will require years to iron out the inconsistencies.

The airline industry, which will be directly affected by the NPRM, cannot afford to spend hundreds of thousands of dollars and thousands of man hours over the next several years trying to iron out these problems.

FAA 2002 14002 if enacted will provide contradictory guidance information to Airline operators, avionics equipment manufacturers, and flight procedure developers, from the guidance that has been promulgated in the above named Advisory Circulars. The NPRM sets a divergent path from the guidance developed in the AC's, and calls the entire matter of global harmonization into question. In these desperate economic conditions, airlines cannot afford to make badly needed capital investments in state of the art avionics systems when none of us can determine which systems and procedures will be the ones to be finally supported in the end. WE MUST HAVE THE OPPORTUNITY TO HARMONIZE FAA 2002 14002 with the recently adopted Advisory Circulars.