

February 20, 2003

Docket Management System
U.S. Dept. of Transportation, Room Plaza 401
400 Seventh Street S.W.
Washington, DC 20590-0001

Reference: Docket Number FAA-2002-12461, FAR Part 60, Flight
Simulation Device Initial and Continuing Qualification and Use, Notice of Proposed
Rulemaking (NPRM)

Dear Sir or Madam:

Aeroservice Aviation supports the Simulator Technical Issues Group (STIG) position on the referenced NPRM, which withdraws the NPRM and forms an industry group to assist the FAA in rewriting the Notice.

Aeroservice Aviation also supports all changes to the proposed rule submitted to the Docket by the STIG.

The NPRM states that all Level A Simulators will be eliminated in two years from the effective date of the rule. This will place an onerous cost on Aeroservice Aviation, which will lose an estimated \$800,000 per year in revenue from lost simulator time. A further effect of the NPRM is that airplane training on these types of aircraft would be the only alternative.

The required FAA approved Quality Control program will cost Aeroservice Aviation \$25,000 per simulator to develop and another \$25,000 per year to maintain. With our present simulator complement, that's an initial cost of \$300,000 plus an annual cost of \$300,000 to maintain the program. No proof of improvement has been shown for the FAA program versus the individual operators' quality control programs.

Thank you for your thoughtful consideration.

Sincerely,
Vito LaForgia
President Aeroservice Aviation

Cc: Mr. Nicholas Sabitini, FAA