AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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February 21, 2003

US Department of Transportation
Docket Management System
400 7th Street, SW
Room Plaza 401
Washington, DC 20591

Dear Sir or Madam:

The Air Line Pilots Association, International (ALPA) representing more than 66,000 pilots with 42 airlines in the United States and Canada, has reviewed Federal Register Notice No. 02-11, Docket Number No. FAA-2002-12461, Flight Simulation Device Initial and Continuing Qualification and Use, of November 15, 2002. The Notice proposes amending 14 CFR Parts 1, 60, 61, 63, 141 and 142 to address initial and continuing qualifications and use of flight simulation devices in commercial pilot training.

Our preliminary review indicates that the proposal can potentially improve the quality of training and the management of flight simulation devices. However, the extremely large number of proposed rule changes requires extensive review to fully assess the impact on the airline-training environment. ALPA believes that respondents have not been given sufficient time to conduct such a review and we urge the FAA to provide additional time for review.

A key area of the proposal involves the treatment of both objective and subjective testing criteria for initial and recurrent certification of the devices. While we support this strengthening of the types of testing required, we are concerned about the provision allowing the testing pilot to be a sponsoring employee, and that that individual does not have to be a line pilot. Another key area is the requirement of a quality assurance program and for the sponsor to act on written comments from users. We support these requirements as a means to enhance the flight simulator representations of actual aircraft handling qualities.

The proposal, however, raises the question about potential conflicts between the Advanced Qualification Program Branch (AFS-230) and the National Simulator Program Office over philosophies on what can and cannot be trained in a flight simulation device.

While ALPA cannot unequivocally support the proposed rule changes, we believe it may result in overall improvement in the use, management and quality of flight simulation devices in air carrier pilot training. Thank you for the opportunity to comment.

Sincerely,

Captain Robert Sumwalt
Chairman, Human Factors and Training Group

RS:amr