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Department Number

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Docket Management System  
Department of Transportation  
Room Plaza 401  
400 Seventh Street, SW  
Washington, D.C. 20590-0001

RE: Federal Registry, Part II  
Department of Transportation  
Federal Aviation Agency  
14 CFR Parts 1, 60, 63, 141, 142  
(Docket number FAA-2002-12461)  
RIN 2120-AH07  
Flight Simulation Device Initial and Continuing Qualification and Use; Proposed Rule

Northwest Airlines contributed to the formulation of the ATA's Training Committee's Simulator Technical Issue Group (STIG) formal response to the referenced proposed rule (FAR 60). Northwest Airlines strongly supports the numerous discussion points and recommendations contained in the various STIG correspondences. In addition, Northwest Airlines would like to place additional emphasis on the following areas of concern.

1. The additional economic burden placed on Northwest Airlines, is significantly understated in the NPRM. Northwest estimates that two additional staff members will be required to develop and maintain an automated system necessary to provide the various Quality Assurance Program documentation to the level specified in the NPRM. In addition, capital investment in equipment to support an automated system is estimated to average \$5,000 per simulator. This represents an additional annual labor expense of \$175,000 (labor plus benefits) and an initial capital investment of \$150,000 (30 FSDs at \$5,000 per).
2. There are additional imbedded costs to the operator that are difficult to quantify without a definitive understanding of the alignment of proposed rule (FAR 60) and the pending unpublished changes to FAR 121 sections H, N and O. For example, various training devices currently in use at Northwest Airlines are not currently qualified nor evaluated by NSP, they are in fact qualified for use under an AFS-230 approved AQP training syllabus (SFAR 58). Proposed requirements to utilize and maintain FTD configuration with aircraft or vendor data packages will require the operator to negotiate to obtain license rights to use the various data. Northwest presently operates a variety of FTDs that currently are not required to utilize manufacturers/vendor data packages. If required to convert to utilize the aircraft manufactures/vendor data, Northwest would be required to invest an additional \$180,000 per device (\$1,080,000 total) for one fleet type. Three additional fleet types would also be impacted producing similar financial burdens. This estimate does not include the costs incurred in actually programming and installing the manufacturers data into an FTD.
3. Finally, the proposed regulation should be streamlined to centrally codify simulator design and qualification criteria. Regulatory items relating to the utilization and/or maintenance of a proposed FAR 60 "qualified" FSD, should reside within the purview of the existing regulatory framework already imposed on an operator and administered by their respective TPAA.

Sincerely,

*Pete Moore*

Pete Moore  
Northwest Airlines, Inc.  
Managing Director of Flying/Chief Pilot

