1. Our transponders,and the transponders I suspect are in most of the 19 seat and smaller aircraft, are not capable of being upgraded by a software upgrade, as was given as the primary option for upgrade.
2. The additional wiring, labor, and downtime affect this class of aircraft much more severely. We don't have a true "heavy check" as we areunder a phase inspection program. Therefore the anticipated downtime will cut the aircraft out of the schedule for a greater cost impact, especially compared to the hull value of the aircraft. As we are dealing with an affected fleet of maybe 20 aircraft, (Fairchild Metro's in FAR 121 service), the cost of the STC approval is going to be spread across a pretty small fleet, greatly increasing our cost per aircraft.
3. Another issue not addressed is whether this would be allowed to be done as a minor alteration, requiring FAA acceptable data only, or if it will be treated as a major alteration requiring FAA Approved Data. The time line for FAA approval, and the cost of obtaining FAA approval, are not addressed, either as cost or the effect on the time line to get entire aircraft fleets done before the proposed effective date of this change. These costs need to be evaluated, and if too great, may a substantial negative effect on our ability to continue operation. We are the sole source of air service for several cities that only have an option of driving for 3 to 5 hours to reach air transportation.
4. I don't have the numbers, but I am not sure if a 19 seat aircraft has had a hijack attempt, much less a successful hijacking, or if it has, are the numbers great enough to warrant this kind of "one size fits all" approach to problem solving. I know that the requirement for hardened cabin doors was limited to part 25 aircraft. This would be a natural dividing line again, if after further evaluation this rule was deemed still necessary.
5. "Hot" wiring any system in an aircraft strikes me as an airworthiness concern that could truly be a safety of flight issue in any aircraft, not just ours.
6. I don't see this proposal as be a cost effective method of improving safety or security. I believe more thought and analysis needs to be completed, to determine if another system already exists to provide an equivalent level of safety.