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19 Mar 2003

MEMORANDUM

From: *R.D. Belisle, CDR*
R. D. BELISLE, CDR
CG AIRSTA Washington

Reply to: CO
Attn of: X301

To: Docket Management System
U. S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590-0001

Subj: NOTICE OF PROPOSED RULE MAKING CONCERNING OPERATIONS USING
AN ENHANCED FLIGHT VISION SYSTEM (EFVS)

Ref: (a) Docket Number FAA-2003-14449 - 8

1. I would like to commend the FAA for recognizing the capability and potential of an EFVS by developing operational regulations for their use. As an operator of the Gulfstream EVS, I want to ensure that the new regulations will be valid not only for today but also for the foreseeable future; therefore, I submit the following comments on the proposed rule.

2. It has been my experience that assessing flight visibility, as outlined in 14 CFR Part 91.175(c)(2), (d), and proposed (l), is difficult to determine and quantify in a practical manner. While the proposed rule for EFVS-equipped aircraft is consistent with existing legislation, it does not address the real issue. The existing flight visibility determination requirement is not practical. A more prudent approach would be to delete the flight visibility requirement in its entirety. This would harmonize the FAA and JAA regulations, which has been a stated goal of both agencies.

3. The proposed rule also defines EFVS design requirements and limitations for usage based on a specific system. I strongly feel that a performance-based rule, independent of current technology, would provide a much more long-lasting and robust regulation. Enabling future technology and its associated performance benefits as well as reducing future regulatory burden should be the primary goals of the new rule.

4. The proposed rule provides 14 CFR Part 91 operators a potential operational credit when using an EFVS during low visibility approach operations. As an EVS operator I have seen firsthand the benefits to situational awareness, runway incursion prevention (by aircraft, vehicles and animals alike) and terrain avoidance. I believe that the overall operational benefit of the Gulfstream EVS is not just for the improved minima during low visibility approach (which is a very, very minor portion of the operating profile of our aircraft) but in the overall additional safety the system brings to our aircraft specifically and the aviation community in general. I believe that if non-Part 91 aircraft are not provided the opportunity to gain an operating benefit,

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that class of aircraft cannot economically justify the purchase of an EFVS. The benefits of an EFVS will therefore not be available to a large portion of the US aircraft fleet. Providing an operating benefit to all classes of aircraft will not only stimulate the implementation of the technology but will also provide an increased level of safety throughout aviation and a larger user base to leverage future system improvements and upgrades.

5. I applaud the FAA for their quick reaction in developing official regulations for the use of EVS. Rapid adoption of revised regulations, which take the above points into consideration, would be greatly appreciated.

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