

Honeywell

DATE: March 26, 2003

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

REF: Docket No. FAA-2003-14449 (NPRM 03-03)
BAE Systems Letter to DOT, dated March 24, 2003 (see attached)

Dear Sirs,

Honeywell Business, Regional, and General Aviation - Glendale, AZ, wishes to provide these comments to the subject NPRM:

Honeywell endorses the comments found in the referenced attached letter from BAE Systems – Redmond, WA.

Further, Honeywell has reviewed the proposed comments to the NPRM as authored by the General Aviation Manufacturers Association (GAMA). As a member of GAMA, Honeywell also endorses those comments.

Regards,

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March, 24th 2003

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

Reference: Docket No. FAA-2003-14449

Dear Sirs,

Please find below BAE SYSTEMS comments and observation with regard to the Notice for Proposed Rulemaking (NPRM) for Enhanced Flight Vision Systems (EFVS), Docket No.FAA-2003-14449; Notice No.03-03 refers.

From the wording of the subject NPRM it is difficult to determine the answer to a very basic question – Can the pilot descend below basic minimums (usually 200 ft) on a Cat I beam, using runway-environment cues obtained solely from the EFVS?

We believe that there have been some very lively debates amongst knowledgeable pilots, engineers, and even FAA attorneys, trying find the answer to this question. So far, without too much success.

We consider that the rules need to be rewritten, so that there is absolutely no question as to their intent. We suggest inclusion of wording similar to the following:

“An aircraft equipped with an approved EFVS system that displays it’s imagery on an approved Head-Up Display, may descend below the DA or DH, but not below an altitude that is 100 ft above the TDZE, providing the EFVS image includes the following cues at or above the DA or DH.

- *Approach lights, or*
- *Runway threshold and touchdown zone.*

A descent below DA or DH that is based on cues that are obtained solely from the EFVS image must not require noticeable changes in heading or sink-rate from the values that existed when approaching DA or DH”.

The NPRM includes a requirement to obtain operations specification authorization for air carriers [proposed revised CFR 91.175e(6)]. Operations specification approval is always required for decreased minimums, but EFVS does not change the minimums. The EFVS allows the pilot to visually acquire the cues specified in 91.175 to descend below DH, but does not affect the minimums given on the approach procedure. Therefore, operations specification approval should not be required.

The requirement for operations specification approval adds an unwarranted financial burden on the operator, and may take a very long time to achieve because most POI's do not have the background knowledge to make this evaluation. The FAA certification pilots and engineers are required to accomplish extensive testing to validate the EFVS. We consider that there is no reason to require an additional approval, beyond that achieved by STC.

We hope our comments above meet with your approval and can be incorporated into the final version of the new EFVS rules.

Yours faithfully,

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