

March 11, 2003

Docket Management System,
U.S. Department of Transportation,
Room PL 401,
400 Seventh Street, SW.
Washington, DC 20590

Subject: Enhanced Flight Vision Systems - Notice of Proposed
Rulemaking (NPRM)
Reference: Docket Number FAA-2003-14449

Dear Mr. Les Smith,

American Trans Air supports FAA's proposal to amend its regulations to reflect technological advances that improve efficiency and safety; harmonize with foreign Authorities and International Civil Aviation Organization. We welcome all changes that bring the regulations into the 21st Century. We believe it is important that this NPRM establish a timeless specification that repairs existing 91.175 deficiencies regarding flight visibility without unnecessarily restricting new/evolving EVS and SVS technology. We believe new operating rules e.g., CFR Parts 91, 121, 135 should be aimed at simplification rather than complex specification.

The regulation regarding EVS, SVS or new technology must provide latitude for improvements and expanded use without modification of the regulations. However, not only does this NPRM precede airborne equipment certification standards, it specifically prohibits future improvements, use and application without exception. For example it precludes CAT II/III applications even though EFVS has been satisfactorily demonstrated in CAT II/III visibilities. It is also contrary to FAA Order 6750.24D.

Revisiting 91.175 should also address how, or remove questionable language regarding the requirement for the pilot to determine that the published flight visibility exists prior to landing the aircraft. FAA should take this opportunity to harmonize 91.175 with JAR OPS 1-430 and remove this undefined subjective task to determine flight visibility. Any revision to 121.651 should also address, or provide exception for commencing the approach if the reported visibility is less than that published for that procedure. As proposed, EVS equipped aircraft have no operational benefit over conventional aircraft. Failure to recognize or provide operational credit denies or delays implementation of new technology on the flight deck.

American Trans Air does not support new definitions/specification that contradict industry/FAA/JAA agreed language contained in Operations Specifications, Advisory Circulars 120-29A, 120-28D or changes not coordinated with industry/users. FAA concludes that flight visibility is substantially the same as EFVS. However, proposes a questionable rule that has not been even remotely discussed with users, manufacturers or foreign authorities. It is also very difficult to comment on this NPRM when critical controversial amendments are simultaneously proposed in FAA-2002-14002. It should be noted FAA-2002-14002 has an unanswered request for an extension to comment. Previous changes to 91.175 sought to bring clarity and specification to the rule. However, this change promotes leaving MDA to 100-HAT based on prominent topographical objects. We should not return 91.175 to subjective terminology and tasks such as runway environment or prominent topographical objects.

American Trans Air believes the EFV/SVS definitions should be made more generic and not limited to the 91.175 applications as follows:

Enhanced flight visibility means the average forward horizontal distance, from the cockpit of an aircraft in flight, at which prominent topographical objects may be clearly distinguished and identified by day or night by a pilot using an enhanced flight vision system.

Enhanced flight vision system (EFVS) means an electronic means to provide a display of the external through the use of imaging sensors, such as a forward looking infrared, millimeter wave radiometry, millimeter wave radar, low light level image intensifying.

Synthetic vision means a computer-generated image of the external scene derived from aircraft attitude, high-precision navigation solution, and database of terrain, obstacles and relevant cultural features.

Synthetic vision system means an electronic means to display a synthetic vision image of the external scene.

American Trans Air believes an Advisory Circular would be more appropriate to establish airborne equipment certification standards; training and AFM endorsements that ensure the items referenced in 91.175 are distinctly visible with the EFVS. This has been the approach with much more sophisticated and complex systems such as Head Up Display, Autoland, TCAS, navigation systems and etc.

American Trans Air recommends this NPRM be withdrawn, coordinated and resubmitted when FAA-2002-14002 is resolved. Pending resolution of FAA-2002-14002, or any future posting in the Federal Register, FAA should reveal its policy and rationale regarding EFVS operations to industry, users and manufacturers.

Questions concerning these comments may be directed to Mr. James Enias, Technical Programs Manager, 317-282-5078.
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