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27 March 2003



IN REPLY, REFER TO:
L390-01-03-1141

FAA-03-14449-37

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

ATTENTION: Docket Number FAA-2003-14449, Notice No. 03-03

SUBJECT: Comments to Docket Number FAA-2003-14449; Enhanced Flight Vision Systems

Cessna's specialists have reviewed the NPRM. Cessna offers the attached comments. Two copies are provided as requested.

Thank you for your consideration.

Sincerely,

CESSNA AIRCRAFT COMPANY

A handwritten signature in black ink that reads "David W. Brant".

David W. Brant
Director, Airworthiness,
Flight Test and Product Safety

cc: Jack Pelton

Enhanced Flight Vision Systems

Cessna recognizes the potential safety and situational awareness aspects of the enhanced vision systems. Consequently, Cessna appreciates that the FAA is addressing the installation of such systems in such a thorough way. Discussion of the minimum requirements, approach procedures, MDA and DH all seem appropriate for the EFVS installations.

There are some items that Cessna believes could be clarified, specifically in the area of displays. The NPRM consistently mentions the use of heads-up displays (HUD) for use with the EFVS systems, and does not provide any concession or guidance as to the use of other display medium. From a human factors standpoint, Cessna feels that a conventional cockpit display (EFIS, MFD, LCD, etc.) in the primary field of view would also provide the pilots an equivalent image, without the burden of a HUD. Cessna would like to request that such verbiage be added to the NPRM so that it will not limit pilot operations with conventional displays.

Cessna also recognizes that alternate display locations outside of the primary field of view are acceptable for advisory information only, and should in no way be construed to mean that a heads-down display could be used for approach and minimum reduction. That does not mean that such a display format could not be installed in the aircraft for situational awareness. This indicates two levels of installation types, and Cessna requests that the FAA be more explicit about allowing advisory only type installations.