

239,479

Alaska Airlines

DEPT. OF TRANSPORTATION
DOCKET #

2003 APR -9 P 3:05

January 28, 2003

Louis C. Cusimano
Flight Standards Service, AFS-2
Federal Aviation Administration
800 Independence Ave, SW
Washington, DC 20591

FAA-2002-14002-28

Dear Mr. Cusimano,

Alaska Airlines requests a minimum of a 60 day extension for comments on for the NPRM contained in FAA 2002 14002. The NPRM document contains numerous flaws that are at odds with, and contradict, recently enacted FAA Advisory Circulars AC120-28D, and AC120-29A.

If this NPRM is adopted as it stands it will be inconsistent with these painstakingly created AC's that have been developed over a period of several years as harmonized documents between the FAA and JAA in Europe. This NPRM will set the aviation industry back 5 to 10 years and may require years to iron out the inconsistencies.

The airline industry, which will be directly affected by the NPRM, cannot afford to spend hundreds of thousands of dollars and hundreds of man hours over the next couple years trying to iron out these problems.

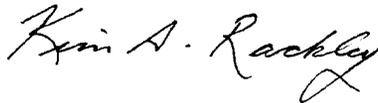
FAA 2002 14002 if enacted will provide contradictory guidance information to Airline operators, avionics equipment manufacturers, and flight procedure developers, from the guidance that has been promulgated in the above named Advisory Circulars. The NPRM sets a divergent path from the guidance developed in the AC's, and calls the entire matter of global harmonization into question. In these desperate economic conditions, airlines cannot afford to make badly needed capital investments in state of the art avionics systems when none of us can determine which systems and procedures will be the ones to be supported in the end.

WE MUST HAVE THE OPPORTUNITY TO HARMONIZE the language of FAA 2002 14002 with the recently adopted Advisory Circulars. This is going to require very careful scrutiny of the NPRM and a determination of which sections of it conflict with specific sections of AC120-28D and AC120-29A. Sections of the NPRM that conflict have got to be fixed!

January 28, 2003
Page 2 of 2

If the NPRM is adopted as currently written, I expect that Alaska Airlines will pay at least \$30,000 in manpower costs to participate in industry groups that will have to iron out the discrepancies that it will create.

Sincerely,

A handwritten signature in black ink that reads "Kim A. Rackley". The signature is written in a cursive style with a large, stylized initial 'K'.

Captain Kim Rackley
Alaska Airlines
Flight Operations Technical Group
Seattle, WA
206-431-7487
fax 206-431-7503