



AIR TRANSPORT ASSOCIATION

April 11, 2003

Docket Management System  
Docket No. FAA-2002-12261  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh Street SW  
Washington, DC 20590-0001

Docket No. FAA 2002-12261, SNPRM, Reduced Vertical Separation  
Minimum (RVSM) in Domestic United States Airspace

The Air Transport Association of America, Inc. (ATA) on behalf of its member airlines<sup>1</sup> concurs with the FAA SNPRM proposals for Docket 12261 for RVSM. We are pleased that FAA proposes to implement RVSM from flight levels 290 through 410 in the Atlantic High and the Gulf of Mexico High airspace and in the San Juan Flight Information Region, as ATA had requested in comments submitted to the docket August 8, 2002. We agree that inclusion of those areas in RVSM airspace will simplify air traffic control and flight operations in those areas.

We also concur with FAA that requirement of dual RVSM-compliant altitude measurement systems for Part 91 turbo-prop aircraft operation in RVSM airspace, and we believe that this requirement will enhance safety.

Although ATA concurs with the FAA proposals in this supplemental NPRM, we request that FAA not permit these changes to cause a delay in the issuance of the final rule or implementation of RVSM.

As we stated in our earlier filing, ATA appreciates the efficiency with which the FAA RVSM team has conducted its business. Thank you for the opportunity to comment.

Sincerely,

/S/

William N. Sears  
Director  
Communication, Navigation & Surveillance

<sup>1</sup> Airborne Express, Alaska Airlines, Aloha Airlines, America West Airlines, American Airlines, ATA Airlines, Atlas Air, Continental Airlines, Delta Air Lines, DHL Airways, Emery Forwarding, Evergreen International Airlines, FedEx, Hawaiian Airlines, JetBlue Airways, Midwest Airlines, Northwest Airlines, Polar Air Cargo, Southwest Airlines, United Airlines, United Parcel Service and US Airways. Associate Members are: Aeromexico, Air Canada, KLM Royal Dutch Airlines and Mexicana.