

157693



Docket Management System  
US Department of Transportation,  
Room Plaza 401  
400 Seventh Street S.W.  
Washington, DC 20590-001

157693  
01/15/02

SUBJECT: Comments on FAA Final Rule, Part 25 and Part 121.

Reference: Docket No. FAA-2001-11032 - 15

Gentlemen,

The 14 CFR Parts 25 and 121 Final Rules adopted January 15, 2002 (Docket No. FAA-2001-11032) identifies several design and operational changes designed to enhance cockpit security in accordance with Public Law 107-71, The Aviation and Transportation Security Act.

Raisbeck Commercial Aviation Group is engaged in furnishing strengthened cockpit doors for the current fleet of Transport Category airplanes, and has about fifty-such Boeing 737s flying at this time, with first deliveries in October of last year. While these installation were made under the provisions of SFAR 92-3, Raisbeck sold these kits to both Alaska Airlines and American Trans Air for Phase 2 application and certification. As such, Raisbeck has an active Supplemental Type Certification program being administered through the Northwest Mountain Region, Aircraft Certification Office in Renton Washington, to complete its responsibilities to both the FAA and it customers.

In support of this STC effort, we submit the following comments regarding the Final Rule as issued.

1. Proposed regulation 25.772(c) and 121.313(j)(2) should have the same language. The wording of 121.313(j)(2) is proper for this case and 25.772(c) should be changed to:

*"There must be an emergency means to enable a flight attendant to enter the pilot compartment in the event that a flightcrew member becomes incapacitated."*

One method for emergency access to the pilot compartment by a flight attendant, in event of incapacitation of a crewmember, is by a procedure for the remaining crewmember to alert the flight attendant through the intercom system and releasing the cockpit door security switch (which is in normal reach of all crewmembers from a seated position). This combination of procedures and hardware is in keeping with the material presented on page 2122 of Vol. 67, No. 10, Tuesday, January 15, 2002 final rule and, we believe, is the most reliable way to assure flight deck access to approved persons and prevent access in case of commandeering of the flight attendants. Raisbeck's Hardened Cockpit Security System incorporates such a mechanical, remote-control positive latch with the existing door-lock system as a secondary backup. Operational requirements currently in use by Raisbeck's airline customers which have its Security System installed, is to require at least two (2) crew in the cockpit at all times.

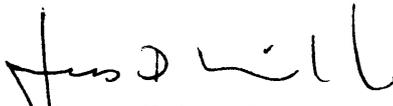
2. Part 121.587 addresses 'Closing and locking of flight-crew compartment door'. There is no equivalent addressing of this issue in the Part 25 revisions of the final rule. Therefore, we assume that the FAA has intended that the procedures for locking and unlocking of the flight deck door be covered in the FAA approved Operating Specification for each airline rather than in the FAA approved airplane flight manual. We agree with this interpretation since a limitation or normal procedures within the FAA approved Airplane Flight Manual or Airplane Flight Manual Supplement might preclude some airlines own FAA approved procedures.

3. With regards to the comments presented by B/E Aerospace (letter dated December 4, 2001), we support the No. 2 recommendation that some hindrance to flight deck access should remain after a cockpit decompression event. We suggest the following:

*"25.795(3) Resist intrusion by a person through openings used for pressure equalization in event of a decompression."*

4. With regard to the comments proposed by B/E Aerospace (letter dated December 4, 2001), we believe that the current FAA 300-joule impact requirement is sufficient to demonstrate integrity of the cockpit door and surrounding structure for intrusion by unauthorized people. If the door and surrounding structure is too strong, then access by crash response teams with normally carried rescue tools may be hindered.

Thank you for this opportunity to comment on this safety regulation.



James Raisbeck  
CEO