



National Transportation Safety Board

Washington, D.C. 20594

Office of Research
and Engineering

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Docket #
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OFFICE OF RESEARCH
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Docket Number FAA-2001-10428 - 19

After reviewing the Special Federal Aviation Regulation (SFAR) and Boeing's original and revised submissions, National Transportation Safety Board staff agree that the FAA's proposed changes to the "Resolution" requirements in FAR Part 121.344, Appendix M, listed below, will continue to provide adequate flight recorder parameter resolution for existing aircraft models.

However, Safety Board staff also recognize that future aircraft may employ designs that will require a higher resolution than is called for either by the existing FAR or by this revised version of the FAR. Therefore, the FAR should note the following: when parameter resolution is specified as a percentage of parameter range, the minimum resolution of the recorded value must be at least an order of magnitude finer than the required parameter accuracy, regardless of the operating range of a given parameter (that is, the larger the operating range, the coarser the required resolution). Accordingly, the certification process should identify any parameters that do not meet this condition, specify those parameters as unique and novel designs, and establish unique resolution requirements for the affected parameters to ensure that the recorded values can be resolved to within an order of magnitude of the parameter accuracy.

FAA-Proposed Global Changes to FAR Part 121.344, Appendix M

- # 5 - Add footnote # 18 For B-717 series airplanes, resolution = .005g.
- # 9 - Global change from .2 to .3 (B-777) (Part of supplemental petition)
- #12a - Global change .2 to .5
- #12b - Global from .2 to .3
- #13b - Global from .2 to .3 (amend foot note 4 to leave A330/340)
- #14a - Global change .2 to .3
- #15 - Global change from .2 to .3 (B747) (Part of supplemental petition)
- #19 - Global change from .2 to .6

#16 - Global change .2 to .25 with but maintain Airbus footnote # 7

#24 - Global from .3 to .5

#23 - Global change .2 to .5 and amend the Airbus footnote # 12

#26 - Add footnote # 19 to accommodate Dassault airplane

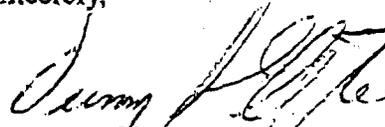
#87 - Global change from .2 to .3

#88 - Global change from .2 to .3

Amend footnotes 5, 9, 11, and 12 and add new footnotes 18 (Dassault) & 19 (B-757 and -767)

We appreciate the opportunity to comment on this important flight reorder issue.

Sincerely,



Vernon S. Ellingstad, Ph.D.

Director, Office of Research and Engineering