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July 25, 2003

Nick Sabatini
Federal Aviation Administration
Associate Administrator for Regulation & Certification
800 Independence Ave SW.
Washington D.C. 20591

Subject: Comments to Docket No. FAA-2003-15653; Amendment No. 121-287

References:

- (A) Amendments 25-106 and 121-288, January 15, 2002, Design Standards
- (B) SFAR 92-5, April 9, 2003, Extension of Regulatory Relief
- (C) 14 CFR Parts 121 Flightdeck Security on Large Cargo Airplanes - Final Rule; Docket No. FAA-2003-15653; Amendment No. 121-287

To Whom It May Concern:

Atlas Air has reviewed reference (C) and supports the intent of the subject adopted Final Rule.

The impact on Atlas Air will be much greater than indicated in the reference (C) Final Rule.

- 1) There is no mention from the FAA of how either the Flight Deck Door Retrofit or the Security Program implementation will be funded. Also, there is no mention of an amount for the disbursement to accomplish 121.313(j)(2) per reference (C). Our supplier will not begin the design process for the Flight Deck Door until Atlas Air signs a contract committing to the purchase of their product. The FAA must provide the funding allocation for both the Flight Deck Door retrofit and Security Program implementation in a timely manner so that we can proceed with the Flight Deck Door Retrofit or the Security Program implementation. This delay will prevent Atlas Air from meeting the Oct 1, 2003 deadline.
- 2) If Atlas Air were to choose the option of the Flight Deck Door retrofit, the vendor would not be able to meet the requirements for complete installation and certification by the Oct 1, 2003 deadline. Atlas Air does not believe the vendor will have the necessary resources or time to survey all Atlas Air airplanes, procure certification, issue the FAA approved SB, make necessary revisions if required, produce the required Kits to install the doors on 21 aircraft in 2 months. (See the table below for estimated Atlas Air costs for Flight Deck Door retrofit).
- 3) Atlas Air requests clarification of the Rule. What options are available to all cargo operators concerning the installation of either Flight Deck Doors or implementation of a Security Program beyond the Oct 1, 2003 deadline? Does the FAA intend to extend the deadline for all cargo operators? Atlas Air recommends that the Oct 1, 2003 deadline be extended 6 months (April 1, 2004) to allow all cargo operators the option of either performing the Flight Deck Door Retrofit portion of the Rule or implementation of a Security Program to be approved by TSA.

cont'd.



Flight Deck Door Retrofit

Fleet	A/C Qty	Estimated Material Costs	Total Lost Net Revenue (5 days)	Estimated Labor Costs per aircraft @ 250 man-hrs	Total Costs
747-200F/SF	18	\$225,000/aircraft	\$122,500	\$15,000	\$6.53MM
747-300SF	3	\$225,000/aircraft	\$122,500	\$15,000	\$1.09MM
Total	21				\$7.62MM

Atlas Air will require a dedicated check line requiring a duration of 6 months to complete the fleet retrofit by April 1, 2004. As shown in the table, the Total cost impact to Atlas Air is approximately \$7.62MM assuming that the installation will begin no later than September 1, 2003. Atlas Air believes that an installation start date of September 1, 2003 is very optimistic without the existence of funding and certification.

Security Procedures Implementation

The FAA estimates that establishing a security program will cost, on average, about \$250,000 for a large air cargo airline. The annual cost to operate a security program will average about \$120,000 at a large air cargo airline. If Atlas Air chooses to implement the Security Program in lieu of Flight Deck Door retrofit, will we receive \$370,000 for the first disbursement and \$120,000/year thereafter? Please clarify.

Atlas Air believes that the SFAR 92-5 Phase I modification currently in place on 21 Atlas Air airplanes affected by the Final Rule provides a high level of security for the interim. To date, no solutions for the new security standards have been approved for the Atlas Air fleet of 747-200F/SF/300SF. Therefore, based on the uncertain final design and the serious material availability and certification issues, Atlas Air is concerned that the deadline imposed by the reference (C) rule concerning Flight Deck Door retrofit by the October 01, 2003 deadline will not be achievable.

Therefore, Atlas Air requests the Oct 1, 2003 deadline be extended 6 months (April 1, 2004) to allow all cargo operators the option of either performing the Flight Deck Door Retrofit portion of the Rule or implementation of a Security Program to be approved by TSA.

Regards,

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cc: Jim Casbarro
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