

Attention Rules Docket No: FAA-2002-11868 Boeing Model 767 Airplanes

Please accept the comments given below on the Notice of Petitions for Exemption.

The CAA Safety Regulation Group opposes the exemptions to CFR 25.365(e) recently cited for the Boeing 767 aircraft on the grounds that the safety standards for UK registered aircraft and those flying into the UK will be impaired following the installation of cockpit doors to meet FAR 25.795(a)(1) & (2) if the exemption is allowed to stand.

With reference to the Boeing letter submitted to ANM-110 dated March 15 2002, specific concerns are:

1. The conservative assumptions quoted in mitigation could well be fully reconsidered in the time frame before the April 2003 end date of SFAR 92. Consequently the TCH could properly define the safety margins and consequences with respect to 25.365(e) using a more refined analysis. When this refined analysis is complete a more appropriate assessment of the safety risk and the need, or otherwise, for an exemption or an equivalent safety finding could be made.
2. The Boeing submission indicates on three counts (the first two and the last bullet) that 25.365(e) can be met i.e. continued safe flight and landing will occur. If so, there is no need for an exemption.
3. Bullets 3, 4, 5 and 6 indicate that windshield failure and decompression will not occur. Analysis of UK mandatory occurrence report data would indicate that there have been two events of rapid decompression through a cockpit in the last ten years. This equates to an event rate of one in ten million hours and was accepted for the short term, 18 months, period of SFAR 92 phase 1 Modifications. Any extension of three to five years, or further, would unacceptably increase the exposure to this risk.

Thank you for the opportunity to take part in your rulemaking process.

Yours faithfully,

Michael Poole
Surveyor