



**Vice President
Maintenance & Engineering**

**U.S. Department of Transportation
Docket Management System
400 7th Street, SW.
Room PL 401
Washington, DC 20591-0001**

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Attached please find El Al's petition for exemption from 14CFR, §128.28 for your consideration.

Any communication on the subject should be addressed to Mr. Arie Fruchter, Vice President Maintenance & Engineering.

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Sincerely,

Arie Fruchter

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Petition of EL AL Israel Airlines Ltd for exemption from 14 C.F.R § 129.28

EL AL Israel Airlines Ltd ("EL AL") submits this petition for an exemption from the requirements of 14 C.F.R §129.28 for EL AL's three (3) B747-200 classic passenger aircraft.

An exemption being requested is required for a period of twelve (12) months.

The request for exemption is based on the equivalent level of security that is being provided on EL AL's B747-200 in its existing configuration. A detailed plan was submitted to the TSA during February 2003.

EL AL Israel Airline Ltd is the Israeli flag carrier, operating scheduled daily flights to the USA. The core of EL AL's scheduled passenger fleet for service to the USA is based on B777-200ER, B747-400 and B767ER aircraft. All these aircraft will comply with the 14 C.F.R § 129.28 regulations by April 9, 2003.

The exemption is requested for three 747-200 classic aircraft only, which are still operating some of EL AL's flights to the USA. The aircraft are: one passenger aircraft (4X-AXQ) and 2 convertible aircraft (4X-AXF and 4X-AXH), when operated in passenger configuration.

The passenger aircraft (AXQ) is scheduled to retire from service within the next twelve (12) months, while the convertible aircraft, which are mainly used for cargo operations, are operated only for four months a year in passenger configuration.

The reason for this petition is based on economic reasons and utilization of the financial resources in a way that will provide better security level on EL AL flights.

The estimated cost for enhanced cockpit door, has increased dramatically from approximately US\$30,000 to over US\$200,000 per aircraft. Security budget and resources respectively are limited. Purchasing of the enhanced cockpit doors for B747-200 aircraft will in fact have a negative influence on EL AL's security resources and security level provided to EL AL's B747-200 passengers.

EL AL believes that the existing security approach on the B747-200 aircraft is an effective and proven one. Due to the unique configuration of EL AL's B747-200 aircraft, the addition of the new enhanced cockpit door will not add any security level beyond the current security level available today.

EL AL's existing preboarding, as well as on board security procedures are coordinated with our local ISC and is well known to the TSA.

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Summary:

EL AL considers that using scarce economic resources on aircraft about to be retired from service or whose utilization for passenger services is limited is not in the public interest where the objectives of the relevant regulation have been achieved and the public security is not endangered.

Due to EL AL's existing available security measures (available to the TSA) it is in the public interest to remain with existing proven program on the three EL AL B747-200 aircraft, and not to divert resources to the enhanced cockpit doors.

The existing security measures provide an equal or better level of security than the level provided by only adding the Boeing enhanced cockpit door. The enhanced cockpit door will not add any onboard security level to the existing security level on EL AL's B747-200 aircraft.

The FAA acceptance of the existing proven security level provided on the EL AL B747-200 aircraft flights and granting the request for a 12 month exemption for EL AL's three (3) 747-200 aircraft will be greatly appreciated.

Yours truly,

Arie Fruchter
Vice President Maintenance & Engineering

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