

27 September 2013

By Post & Electronic Transmission

Mr Mark Bathie
CASR Part 90 Project Leader
CASA Standards Development Branch
Reply Paid 2005
Civil Aviation Safety Authority
CANBERRA ACT 2601

Email: nprm1213cs@casa.gov.au

Our Ref: T40-0093
Your Ref: CS 12/15

Dear Mr Bathie,

Notice of Proposed Rule Making 1213CS – Addition of Safety Based Requirements for Hardened Cockpit Doors

The Australian and International Pilots' Association (**AIPA**) is the largest Association of professional airline pilots in Australia. We represent nearly all Qantas pilots and a significant percentage of pilots flying for the Qantas subsidiaries (including Jetstar Airways Pty Ltd). AIPA represents over 2,300 professional airline transport category flight crew and we are a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries.

AIPA, through its Safety and Technical Sub-Committee, is committed to protecting and advancing aviation safety standards and operations. We appreciate the opportunity to provide the views of flight crew on the proposed amendments to Part 90 of the *Civil Aviation Safety Regulations 1998* concerning the addition of safety based requirements for hardened cockpit doors.

Key Proposal 1: To implement 'Flight crew compartment access' provisions in Part 90 of CASR 1998

AIPA supports any proposal that considers practical means of provided enhanced security and operational safety for flight crew members.

Key Proposal 2: To implement 'Flight crew compartment escape' provisions in Part 90 of CASR 1998

AIPA supports any proposal that considers practical, cost-effective means of ensuring post-accident entry to the cabin, both as an alternative to other cockpit escape paths and to allow flight crew assistance to the cabin crew.

However, we are unsure of the extent to which these proposed rules will affect those Australian aircraft that currently meet the ATSR requirements and how CASA intends to measure the related cost-benefit analysis.

Safety-related Consequences of Physical and Procedural Requirements Imposed by Agencies other than CASA

AIPA is particularly disappointed to note the abrogation by CASA of its aviation safety responsibilities highlighted by this NPRM.

Both the US FAA and Transport Canada references underline that those agencies clearly considered the certification, continuing airworthiness and maintenance aspects of the physical security arrangements considered necessary immediately following the events of September 2001. It appears that, despite requests from the Office of Transport Security to participate in the security rule-making, CASA declined to be involved despite the safety-related impact on flight operations.

While we appreciate the potential benefits to flight crew from these proposed changes, we are also concerned that 10 years had to elapse before these issues were addressed. AIPA looks forward to CASA providing proper systematic consideration within more appropriate timeframes of the safety-related consequences of physical and procedural requirements imposed by agencies other than CASA.

Yours sincerely,



Richard Woodward
Vice President

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