



National Air Carrier Association

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Mr. Adam Giraldes
Federal Aviation Administration
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Air Transportation Division
121 Air Carrier Branch, Room 831
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RE: Comments re: Advisory Circular 120-27F, Aircraft Weight and Balance Control

National Air Carrier Association (NACA) submits these comments on behalf of its sixteen member airlines. NACA's membership is a diverse group of air carriers, certificated under Title 14, part 121 of the Code of Federal regulations, providing non-scheduled and scheduled passenger and cargo services to both military and commercial customers

NACA associates itself with comments submitted by Airlines for America (A4A) and Regional Airline Association (RAA) in this matter, particularly these points:

1. FAA did not provide its detailed risk analysis to industry that was used to determine the basis for reversing the agency's policy of using standard passenger weights. FAA verbally indicated two reasons National Health and Nutrition Examination Survey (NHANES) was no longer believed to be a good source for average passenger weights: (1) only volunteers were used, and, (2) they were weighed in just a gown and not fully clothed. NACA does not believe these two reasons are sufficient cause for abandoning a system that has worked well for forty-five years. Airlines will surely use volunteers if FAA imposes the draft advisory circular, just as did NHANES, and, in the previous

- AC-120-27E, five pounds was added to the NHANES data to compensate for clothing, which is still reasonable.
2. NACA believes requiring every airline to conduct its own survey will introduce additional risk to the system without any demonstrated reason to have a multitude of surveys. Pushing responsibility for oversight of this function to Certificate Management Offices is ill-advised in NACA's opinion.
 3. NACA calls on FAA to convene a new aviation rulemaking committee (ARC) to address any concerns FAA has about needing to update AC 120-27E. NACA participated in the ARC preceding AC 120-27E and volunteers to sit on a new ARC, as well.

NACA's members have particular issues with certain provisions of the draft advisory circular, including these points:

1. NACA's members have no experience conducting this type of survey, but, FAA states the survey cannot be conducted by a third party. It is unreasonable to expect NACA's members to establish an entirely new department to accomplish this task.
2. Many of our flights operated by NACA members are for Department of Defense; weights for these passengers, with gear, are provided by the base commanders.
3. Each charter group is often vastly different in physique. A men's college football team is much larger than a women's volleyball team. Would carriers have to survey every charter flight? FAA states it will require a sample size of 2,700 for a survey to be valid. We cannot calculate how long it would take each non-scheduled airline to successfully collect data on 2,700 passengers.
4. Non-scheduled airlines have neither leased airport space to weigh passengers nor baggage processing facilities to weigh bags.
5. Non-scheduled airlines have not experienced change in its passengers' handling of luggage - overhead bins versus checked - which is to be expected, considering the nature of charter versus scheduled services.

FAA has allowed the use of average weights since 1968 and depended on NHANES data since 2004. Three other federal agencies also use NHANES data without apparent concern for its accuracy or current applicability. NACA and its carriers are not aware of any issues with flights that used this data.

NACA concurs with alternate solutions presented in A4A's and RAA's filing. Those are:

1. Continue to use the NHANES data for average passenger weights, with adjustments for full clothing and seasonal wear.
2. Continue to use crew weights as listed on medical certificates.
3. FAA should not abandon a thirty-year policy before requesting public notice and comment and establishing an ARC. The notice should refer to data derived from the agency's Safety Management System, supporting the safety concern. This way the ARC would have a proper basis to create required and agreed changes in the new advisory circular

NACA appreciates the opportunity to submit these comments.

Respectfully,

A handwritten signature in black ink, appearing to read "George R. Paul", with a long horizontal flourish extending to the right.

George R. Paul
Director of Technical Services