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DEPT. OF TRANSPORTATION
DOCKET

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VIA FEDEX LETTER

February 1, 2002

Public Docket Office
Department of Transportation
400 Seventh Street, SW
Room PL-401
Washington, DC 20590-0001

RE: Comments of FedEx Express to Docket No. FAA-2001-111229 - 4543

Dear Sirs:

The following constitutes the comments of FedEx Express to Docket No. FAA-2001-111229: Firearms, Less-Than-Lethal-Weapons, and Emergency Services on Commercial Air Flights. FedEx Express an all-cargo air carrier operating under Part 121 of the Federal Aviation Regulations (FARs), with flight operations throughout the United States and most of the world. FedEx currently operates 321 transport category aircraft, and employs over 4000 crewmembers. We certainly appreciate the opportunity to comment upon security-related issues in the aftermath of September 11, and commend the FAA for its willingness to consider unconventional and novel ideas intended to enhance the safety and security of passengers and property about the aircraft it regulates.

The FAA has specifically requested comments on the following issues:

1. Whether pilots and other flight crewmembers should carry firearms or less-than-lethal weapons, and if so, whether it should be on a voluntary basis.

FedEx response: FedEx does not purport to answer on behalf of any other all-cargo airline, much less any passenger air carrier, but strongly opposes the carriage of firearms or less-than-lethal weaponry aboard FedEx all-cargo aircraft. FedEx aircraft are configured to carry very few persons other than the assigned crew. FAA inspectors, check airmen, licensed airmen, animal handlers and other supernumeraries, and FedEx employees constitute the vast majority of individuals who are permitted to occupy "jumpseats" located within the cockpit area, and immediately outside of the cockpit in an area FedEx calls the courier area. FedEx believes that the primary security measures should center around knowing and verifying the identity of those persons, confirming their eligibility for carriage (in

accordance with FAA regulations and FedEx policy) prior to boarding, and utilization of effective screening of persons and carry-on items. In addition, since September 11, and in compliance with Special Federal Aviation Regulation (SFAR) 92-3, FedEx has begun the process of installing cockpit door locking and strengthening hardware to ensure that cockpit security is enhanced in those aircraft which have jumpseats outside of the cockpit. FedEx strongly believes that the carriage of firearms or other weapons, aboard its all-cargo aircraft is unwise, unwarranted, and would result in a degradation of safety and security in its flight operations.

2. Whether and how the weapons should be stored on the aircraft or carried on board.

FedEx response: For the reasons set forth in response to Issue 1 above, FedEx does not favor the carriage of lethal or non-lethal weapons aboard its all-cargo aircraft. In addition, we are also doubtful that weapons can be safely stowed aboard aircraft over the long term.

3. The types and numbers of less-than-lethal weapons that should be carried on aircraft for use by qualified flight deck crewmembers.

FedEx response: For the reasons set forth in response to Issue 1 above, FedEx does not favor the carriage of any type of weapon aboard its all-cargo aircraft. We believe that the carriage of such weapons is not warranted aboard all-cargo aircraft, and would degrade flight safety and security.

4. The types of restraining devices or other types of equipment that should be on aircraft.

FedEx response: FedEx does not favor the carriage of restraining devices aboard its all-cargo aircraft. We do not believe that the threat to our aircraft justifies the equipage of such devices, and submit that the careful screening of persons authorized to be carried aboard FedEx aircraft, as well as the strengthening of the cockpit doors, is a much better alternative. These persons are carried aboard FedEx aircraft in accordance with FAR Section 121.583, and they will do have the necessary training to deploy these devices. Given that FedEx aircraft will be equipped with a secure and impenetrable cockpit door, we do not believe that pilots should leave the controls of the aircraft to become involved in a physical confrontation.

5. The types and numbers of firearms that should be carried on aircraft for use by qualified pilots and the types of information.

FedEx response: For the reasons set forth in response to Issue 1 above, FedEx does not favor the carriage of any type of weapon aboard its all-cargo aircraft.

6. The amount and type of weapons training that we should require, including whether there should be initial and recurrent training.

FedEx response: For the reasons set forth in response to Issue 1 above, FedEx does not favor the carriage of any type of weapon aboard its all-cargo aircraft.

7. How the less-than-lethal weapons and firearms should be carried, stored, maintained (if necessary), and accessed on the aircraft.

FedEx response: For the reasons set forth in Issue 1 above, FedEx believes that the carriage of any weapon, lethal or non-lethal, aboard its all-cargo aircraft is unwarranted, unwise, and degrades flight safety and security. We are also doubtful that weapons can be safely stored aboard aircraft over the long term.

8. What types of aircraft modifications we should require when aircraft are equipped with less-than-lethal weapons or firearms, such as modifications to ventilation or avionics systems.

FedEx response: The FAA is correct that a number of modifications to the Type Certificates of aircraft would have to be accomplished to account for the use or discharge of weapons aboard the aircraft, whether intentional or nonintentional. FedEx does not believe that the time, effort or cost of such modifications is warranted for its all-cargo aircraft.

9. Whether the qualifications for using less-than-lethal weapons or firearms should be integrated into the existing systems for establishing and maintaining airman qualifications, such as pilot certificates and ratings.

FedEx response: FedEx believes that training or qualifications related to the use of lethal or less-than-lethal weaponry is wholly unrelated to existing systems for establishing and maintaining airman qualifications. As FedEx has no intention of allowing such weaponry aboard its all-cargo aircraft, such training is unnecessary.

10. The circumstances under which less-than-lethal weapons may be used.

FedEx response: As FedEx has no intention of allowing such weapons aboard its all-cargo aircraft, we have no comment to Issue 10.

11. How to identify individuals who are willing to provide emergency services on commercial flights.

FedEx response: Because individuals such as law enforcement officers, firefighters, and other emergency personnel rarely, if ever, are transported aboard FedEx all-cargo aircraft, FedEx has no comment to Issue 11.

12. Whether to maintain a registry of some or all of these individuals.

FedEx response: FedEx has no comment to Issue 12.

13. The minimum qualifications of those who would provide emergency services on commercial air flights.

FedEx response: For the reasons set forth in response to Issue 11 above, FedEx has no comment to Issue 13.

14. The type of training providers of emergency services on commercial air flights should have.

FedEx response: For the reasons set forth in response to Issue 11 above, FedEx has no comment to Issue 14

Sincerely,

FEDERAL EXPRESS CORPORATION



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