

BEFORE THE  
FEDERAL AVIATION ADMINISTRATION  
WASHINGTON D.C.

Docket FAA-2011-0763

COMMENTS FROM DELTA AIR LINES, INC.

Delta Air Lines is fully supportive of this rule making. Besides the safety enhancement with facilitating the ability to upload the appropriate navigation information to the aircraft in a timely manner, this rule making has the potential to increase the quantity and quality of information available to the pilot by segregating the navigation databases into the areas of operations. Due to limited memory space in many navigation databases and the cost prohibitive issues with adding memory to the older systems, aircraft operators have to limit the amount of navigation data. For aircraft that can be routed anywhere in the world at anytime, operators face a logistical challenge to provide departure, arrival and approach navigation information at departure, arrival and enroute airports. With this rule making it would allow greater flexibility to tailor the database with respect to the flight and area of operation thus allowing a greater fidelity of navigation data to be available to the pilots.

This NPRM proposes to only grants pilots of Part 91 aircraft the authority to perform Nav Database loads stating that Part 121 aircraft are not generally equipped with Navigation Systems affected by this rule. Delta believes that Part 121 pilots should be included in this rule. Aircraft used in Part 121 operation have the same database size limitations as Part 91 aircraft and potential exists for avionics system developers to provide equipment to solve for the complexity issue stated in the NPRM. For example, in 2010 this operator installed an eADL with mass storage in the pedestal of an MD90 simulator. It was loaded with 3 Nav Databases. It was demonstrated in the Simulator that with a few touchscreen keystrokes the pilot could swap between these Nav Databases with FMS displays used to verify the load changes. The load procedures were intuitive, took 2-3 minutes to occur with annunciations showing progress and completion.

Delta proposes the final rule be expanded to allow any aircraft, regardless of the type of operation, to have the navigation databases updated by an appropriately qualified pilot provided the process/program has been approved by the administrator.

Please contact Charles M. Schramek, General Manager Quality Assurance and Compliance, at (404) 715-1112 or e-mail at [chuck.schramek@delta.com](mailto:chuck.schramek@delta.com), if you have and questions or need additional information.

Sincerely,



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Delta Air Lines, Inc.