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June 23, 2008
B-H300-08-DML-29

Ms. Dana Schulze
AS-IO
National Transportation Safety Board
490 L'Enfant Plaza, SW.
Washington, DC 20594-2000



Subject: Comments to Docket NTSB-2008-0004, "Notification and Reporting of Aircraft Accidents or Incidents and Overdue Aircraft, and Preservation of Aircraft Wreckage, Mail, Cargo, and Records"

Reference: National Transportation Safety Board (NTSB) Notice of Proposed Rulemaking (NPRM) published in the Federal Register on March 31, 2008 (72 FR 16826)

Dear Ms. Schulze:

The Boeing Company is supportive of the subject proposed NTSB regulation in that the overall intent of the reporting requirements is essentially to enhance safety. Further, we agree that such reports submitted using Form No. 6120.1, as would be required by the proposed regulation, should enable the NTSB to conduct investigations, influence corrective actions, and propose safety recommendations in a timely manner. This should benefit the unmanned aircraft industry in general, the unmanned aircraft operators specifically; and the National Airspace System (NAS) stakeholders as a whole.

However, we consider that the proposed frequency of reporting may be greater than that anticipated by the NTSB, owing to:

- the relative immaturity of the unmanned aircraft platforms (compared to manned aviation),
- the urgency to supply the war-fighter/first responders with new and innovative products/services, and
- the slowly emerging regulatory and certification guidance materials published by the Federal Aviation Administration (FAA) to date.

In light of this, we suggest that you reconsider the parameters for when reports are actually required to be submitted.

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We also urge the NTSB to collaborate with the FAA to ensure that the proposed requirements of this NPRM are consistent with the FAA's planned regulations and standards, and that no duplication of required actions will inadvertently result.

We appreciate the opportunity to review this proposal and trust that you will consider our comments prior to finalizing the document.

Please direct any comments or questions to Ms. Jill DeMarco of this office at (425) 965-3005.

Sincerely,



Douglas M. Lane
Director, Airplane Certification & Regulatory Affairs

cc:

Electronic Docket Operations
Docket NTSB-2008-0004
www.regulations.gov

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