

**In the matter of :****Notice of Proposed Rulemaking for  
Qualification, Service, and Use of  
Crewmembers and Aircraft Dispatchers.****Docket No. FAA-2008-0677****REQUEST FOR CLARIFICATION OF SPECIFIC CLAUSE**

On Tuesday, April 7<sup>th</sup> the FAA conducted a public hearing in the above titled Notice of Proposed Rulemaking. At the conclusion of that meeting the FAA agreed to entertain questions submitted to the docket for the purpose of clarification of specific clauses in the NPRM for the purpose of giving individuals clearer understanding so they could better formulate comments. We thank the FAA for this opportunity to ask the following question for the purpose of clarification.

Midwest Airlines Flight Standards and Training department uses Ground Instructors who are all licensed Aircraft Dispatchers. The FAA has proposed in 121.1421 Dispatcher Instructor and check dispatcher; Eligibility, training and evaluation, the standards to become a dispatch instructor. One of these requirements is the instructor must maintain aircraft dispatcher currency. We have cases where a individual does not meet currency and understand that we could consider this person as a subject matter expert to allow them to instruct dispatchers. However the FAA has also proposed in Federal Register Vol. 74, No. 7, January 12, 2009 at page 1440 table 5 labeled "Personnel authorized to administer Aircraft Dispatcher Training and Evaluation, and to conduct observation activities under subpart CC."

In this table it would appear that our subject matter expert as defined above would fall into the column Non-certified dispatch instructor, and has such prohibited from conducting instruction in the following: DRM, Certificate Holder Computer Systems, Computer Flight Planning, Contingency Operations, Practical Dispatch Applications. Have we correctly interpreted the table and it's accompanying notes?