of the commenters advocating automated flight following systems state that the three accidents cited by the FAA in Notice 95–5 would not have been prevented by the use of a dispatcher. One commenter states that in his experience PIC's typically check dispatcher computations but do not duplicate the computations as the FAA stated in Notice 95–5.

The NTSB states that in its 1994 study report, it examined the differences in flight dispatch requirements between parts 121 and 135. The NTSB found that, in the absence of support from licensed dispatch personnel, pressures on commuter airline pilots to accomplish several tasks between flights in shorter periods of time might increase the risk of critical mistakes that could jeopardize the safety of flight. As a result, the NTSB recommended that the FAA require each principal operations inspector (POI) to periodically review air carrier flight operations policies and practices concerning pilot tasks performed between flights. This review was to ensure that carriers provide pilots with adequate resources (such as time and personnel) to accomplish those tasks. According to NTSB, the proposed rulemaking, if implemented, would meet the intent of the safety recommendation (A–94–193).

ASA, RAA, and Gulfstream International Airlines support many of the elements of the dispatcher rule. They state that flight dispatch systems that are required under part 121 are extensive since they address the dispatch and en route communications needs for a span of air carriers from international airlines with worldwide flight operations to the largest U.S. regional carriers. ASA supports the requirement for licensed dispatchers, believing that the most qualified candidates for licensing as dispatchers are the individuals currently employed as flight followers. These commenters request that the criteria in § 65.57 be examined to provide guidance for granting a dispatcher certificate based on practical experience as a flight follower under part 135 operations. According to the commenters, many flight followers have passed the written portion of the dispatch license but have not attended formal dispatch school and do not hold licenses. However, they may have extensive practical experience in scheduled air carrier operations performing what is essentially a dispatcher function. According to these commenters, the criteria contained in § 65.57 includes experience in scheduled military operations. The commenters believe that if military experience is applicable, the experience of a flight follower with a scheduled airline should qualify. These commenters also point out that the practical portion of the dispatcher license is administered using a Boeing 727 aircraft. The commenters believe that while many of the functions and decision making circumstances would be the same, the experience of part 135 flight followers, managing flights of high performance turbopropeller-powered aircraft is a considerably more significant and practical measure of their capabilities than military experience or demonstrating their skills in managing a turbojet operation. The commenters believe that the cost and time to send current flight followers to a formal dispatcher school is not justified.

Samoa Air comments that since its longest flight is only 70 miles (35 minutes), a dispatch system would not enhance or change any of its current requirements. Samoa has established VFR and IFR fuel requirements to all of its destinations and the requirements do not change. The only alternate airport is the destination airport. Samoa also states that § 121.101 requires each domestic and flag operator to show that enough weather reporting facilities are available along each route to ensure weather reports and forecasts necessary for operations. Section 135.213 allows the pilot in command to use various other sources, including his own weather assessment, for VFR operations. Of the four airports Samoa serves, only one (departure airport) is in controlled airspace with weather reporting facilities and instrument approach procedures. Enroute and terminal weather conditions are received through the ATC tower from their weather station. VHF communications with the tower cover almost the entire route, so the aircraft has ready access to any weather information available and direct information on the status of communications, navigation, and airport facilities. A dispatcher would not enhance safety but would add significant cost. If Samoa is required to provide weather conditions at each airport to the pilot from an approved source and the pilot can not assess the weather himself, the rule change could eliminate all of Samoa's present operations.

Similarly, Inter Island and Air Vegas comment that the requirement for enroute weather reporting is unfeasible because of minimal weather reporting facilities in the certificate holders' regions. Air Vegas also comments that radio communication in mountainous terrain would be difficult if not impossible with VHF radio systems because mountains block radio transmission.

Air Vegas comments that all ''dispatcher duties'' are currently being accomplished by personnel in the operations department, station managers, and company pilots. All flight following is being done by telephone. The commenter states that current flight following procedures meet part 135 requirements and are operationally safe and efficient.

Mesa Airlines comments that due to its short flight segments and the lack of significant weather changes in the areas in which it operates, a dispatch system is not needed. Mesa believes that all enroute communications can be accomplished by ATC.

AACA states that the requirements of subpart E come at a time when the availability of weather information in Alaska has been identified as a significant issue adversely affecting aviation activities (proceedings of an NTSB ''Aviation Safety in Alaska'' forum, May 1995).

The Airline Dispatchers Federation supports the dispatch proposal and agrees with the upgrading of current commuter facilities to dispatch centers. It believes this upgrading is necessary because of the extensive use of code-sharing by the aviation industry. The commenter is not in favor of amending part 121 dispatch rules for certificate holders of the 10- to 19-seat category. The commenter provides its estimate of costs to certificate holders that could be affected by the implementation of this rule. The commenter notes that the costs provided by some certificate holders may not be accurate. For example, cost estimates concerning flight planning and performance issues are inaccurate since several airlines use bulk stored flight plans and performance information taken directly from aircraft flight manuals for fuel planning. The commenter also provides its assessment of various aircraft accidents for which it believes dispatchers could have made a difference in changing events that led to the accident (crew fatigue, lack of management oversight, operational control issues, late arriving weather information).

ALPA comments that dispatchers should be required to complete their 5-hour inflight operating experience in 10- to 30-seat aircraft, not in larger 60-seat aircraft, as currently allowed. ALPA proposes that § 121.400(b) be amended by adding a group specific to propeller-driven aircraft with a seating capacity between 10–30 seats.

AACA comments that due to the operating environment of Alaska, the pilot and not the dispatcher is in a