annual wage of \$24,000. This position is based on information obtained from the Aircraft Dispatchers Federation (ADF) and a survey of several part 135 operators with dual operations specifications (parts 121 and 135). The FAA estimates a cost of \$13,000 as the average minimum annual operating cost of establishing a dispatch system (assuming nothing is in place by a particular operator). This includes costs for telephone service, office space, office furniture, access to a current weather service, and access to air-ground communications.

Pilot Qualifications. Several commenters are opposed to the proposed requirements for pilot qualifications on the basis of an anticipated high cost of compliance.

FAA Response: The final rule does not contain requirements for crewmember training and pilot qualifications. These requirements are contained in a separate rulemaking action that pertains to operators under parts 121 and 135.

Cockpit Protective Breathing Equipment (PBE). One airplane manufacturer questions the need for fire-fighting PBE on the flight deck of commuter airplanes with 10 to 19 passenger seats. The commenter asserts that it would cost an additional \$23,800 dollars (rather than the FAA's cost estimate of \$400 per PBE unit) to equip each one of its 10-to-19-seat airplanes with such PBE on the flight deck. This cost estimate does not include a onetime \$52,000 for development costs. According to the commenter, its airplanes are already equipped with fixed smoke-and-flame protection PBE at each of the two pilot stations. Thus, the only potential cost would be for a fire-fighting PBE on the flight deck.

FAĂ Response: The FAĂ has decided to drop the proposed requirement for fire-fighting PBE on the flight deck of affected airplanes with 10 to 19 seats.

Costs of Compliance—All Items. According to one commenter, the FAA's analysis grossly underestimated costs. The cost of the proposed rule should be \$1.6 billion instead of the FAA's estimate of \$275 million.

FAA Response: The FAA disagrees with the commenter. The FAA contacted the commenter to acquire information on the methodology and basic assumptions or rationale used to derive the cost estimate. With regards to the methodology, the commenter indicated that he used his own judgment and information provided by other commenters. None of his analysis was supported empirically by outside sources or seemed to be more credible than that used by the FAA. As to the basic assumptions, the commenter said there was no documentation that detailed the methodology used to derive his cost estimate of \$1.6 billion. Therefore, since the commenter was unable to substantiate the cost estimate, the FAA will retain its cost estimate and all associated methodology.

2. Cabin Safety

First Aid and Medical Kits. Several commenters provided cost estimates ranging from \$1,500 to \$2,000 per airplane for the first aid and medical kit requirement, but these cost estimates were submitted without any detailed documentation. An additional commenter, who was contacted, agrees with the cost per first aid kit, but argues that the turnover rate should be 100% a year due to pilfering.

FAA Response: The cost estimates provided by the commenters are higher than the FAA's original estimates. The FAA based the equipment costs on offthe-shelf prices that would be available to all operators. The FAA contacted one commenter that estimates the cost of \$1,500 per airplane for a first aid kit. The commenter's cost estimate includes up front costs such as the engineering designs, administrative paperwork, cost of tooling, as well as the cost of equipment and materials. The FAA assumes that the first aid kits, as well as medical kits, can be secured with Velcro tape and would be secure enough to meet the 18-G requirement. As to design and administrative costs involved with securing first aid and medical kits, the FAA is using the upfront costs of \$1,500 submitted by the commenters. With regards to pilferage, none of the large airlines complain about first aid kits being stolen, and the FAA believes that if any kits are stolen, air carriers would take positive steps to stop such activity.

Locking Cockpit Door and Key. Several commenters are concerned that some locking cockpit doors would have to be retrofitted to work with a key, but cost estimates are not provided.

FAA Response: The FAA acknowledges that the commenters correctly state that keyless locks on affected lockable cockpit doors would have to be retrofitted to work with keys. Based on information from FAA technical personnel, the FAA is assuming that all of the 20-to-30-seat airplanes would have their locks or doors retrofitted, at a total cost of \$182 per retrofit (\$100 equipment + \$82 labor).

Flotation Cushions and Life Vests. One commenter opposes the requirement because of the equipment cost and weight penalty. This commenter states that the seat cushions in the METRO airplane would not serve as effective flotation devices. In addition, this commenter provides a cost estimate for acquiring and retrofitting individual flotation devices for METRO airplanes.

FAA Response: The FAA concurs that if the seat cushions in a particular airplane model do not serve as flotation devices, then individual flotation devices would have to be acquired. Also, the FAA verified the commenter's cost estimate and has incorporated it into the regulatory evaluation for the final rule.

Halon Fire Extinguishers. One commenter from Alaska provides an aggregate cost estimate for the required halon fire extinguishers which was substantially higher than the estimate in the NPRM. The commenter does not provide additional commentary on the requirement beyond the costs.

FAA Response: The FAA partially disagrees with this commenter. A onetime cost estimate to account for upfront administrative and engineering costs to comply with Type Data Certificates was submitted by the commenter. The FAA verified this costestimate and has incorporated it into the cost of the final rule. However, the FAA contends that there would be no major retrofit costs because the halon fire extinguishers would replace existing fire extinguishers with the same size canister. The FAA's equipment costs were based on off-the-shelf prices for halon which would be available to all operators.

Carry-on Baggage. A commenter from Alaska believes that the FAA's cost estimate for the carry-on baggage screening program implementation is too low. This commenter reasons that the wage rates and paperwork burden would be higher for the Alaska air carriers. In addition, the commenter strongly objects to applying the scanning program at locations that do not have terminal facilities. This commenter believes that each operator will need to develop a measurement device to check each item of carry-on baggage which will result in delays. All of this will cost \$156,000 per year for each Alaskan commuter air carrier; there is no detailed explanation of what this entails. Another commenter, who was contacted, believes that for crewmembers to enforce the carry-on baggage program will delay each flight one minute; this flight delay will need to be costed out.

FAA Response: The FAA disagrees with these commenters. The FAA is unable to evaluate the Alaska commenter's cost estimate without a