



U.S. Department
of Transportation
**Federal Aviation
Administration**

The Dutch Safety Board
P.O. Box 95404
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Netherlands

Dear

This is a final response to a safety recommendation issued by the Dutch Safety Board (DSB) to the Federal Aviation Administration (FAA) on December 15, 2011. The DSB issued the recommendation as a result of an incident which occurred on February 10, 2010, involving a KLM Boeing 737 that mistakenly departed from a taxiway. The recommendation was assigned FAA control number 12.139.

12.139. The Dutch Safety Board recommends to both EASA and FAA that the minimum CVR recording time should be increased to support safety investigations.

FAA Response. An important part of the rulemaking process within the FAA is economic evaluation and analysis. For us to justify placing a financial burden on the U.S. operators, we must be able to prove a benefit, such as improved safety. In this case, we would need to show actual instances where retrieval of data from a long-duration cockpit voice recorder would have provided tangible aid, not available through other means, to investigators that could then be used to prevent similar accidents or incidents. The FAA does not philosophically oppose installation of long-duration voice recorders. However, investigating authorities have not provided sufficient, concrete examples that would enable us to financially justify rulemaking to mandate installation of long-duration CVRs on U.S. aircraft.

The FAA greatly appreciates the efforts of the Dutch Safety Board in promoting aviation safety. If you have any questions, or need additional information regarding these safety recommendations, please contact Mr. Jeff Gorney, AVP-420, at (202) 267-8748.

Sincerely,