

ASSOCIATION OF FLIGHT ATTENDANTS

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CIVIL AERONAUTICS
BOARD

April 9, 1981

Civil Aeronautics Board
1825 Connecticut Avenue
Washington, D.C. 20423

Attention: Docket 26044

Gentlemen:

The Association of Flight Attendants (AFA) represents the safety interests of 23,000 flight attendants from sixteen U.S. carriers. We have reviewed the CAB Supplemental Notice of Proposed Rulemaking to Part 252 and appreciate the opportunity to comment.

The Association of Flight Attendants does not support a total ban on smoking aboard aircraft. Although the health hazard of smoking is very real, the danger of in-flight fire caused by surreptitious "lavatory" smoking is life-threatening in a much more immediate, critical way. In 1973, 116 people died aboard a Varig Boeing 707 as a result of an in-flight fire started in the aft restroom. The speculated cause of the fire was a cigarette thrown into the lavatory trash bin. For this reason, the AFA would support a total ban on smoking provided two stipulations were incorporated into the ban: one, installation of highly sensitive fire and smoke detection systems in all enclosed areas such as galleys and restrooms; two, heavy fines levied on all persons transgressing the ban.

Following the Varig accident, the NTSB recommended that:

"... the FAA require a means for early detection of lavatory fires on all turbine-powered, transport-category aircraft operated under FAR Part 121."

In the same report NTSB also recommended:

"... the FAA organize a government/industry task force on aircraft fire prevention to review design criteria and formulate specific modifications for improvements with respect to fire potential of enclosed areas, such as lavatories, in turbine-powered aircraft operating under Part 121 of FAR."



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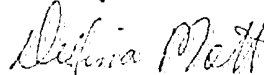
Since 1973, the FAA has passed two regulations for greater fire precaution: 25.1215 and 25.855. Both of these regulations are concerned with interior compartment materials and airtight containers. Regulations 25.855 and 25.1221 are concerned with smoke or fire detection in baggage compartments, but no where cites smoke detection for enclosed areas in passenger compartments.

The CAB February 11, 1981 notice addresses issues relative to a total ban or total revocation of smoking. The AFA would prefer to keep smoking to a reduced, segregated area aboard the aircraft. To ensure passenger and flight attendant health and comfort, all air packs and ventilation systems have to be in good working order. To save fuel costs, some airlines have taken to shutting off air packs while continuing to allow smoking under these poor air quality conditions. This is bound to adversely affect the health of persons aboard the plane and induce complaints.

Current regulations have put the flight attendant in the position of enforcing and attending to passenger complaints regarding smoking. This has led to verbal abuse and even physical assault on the flight attendant. The Association would not want crewmembers to be put in positions of enforcement regarding a total ban.

In view of the questions asked by the CAB, the Association of Flight Attendants would have to support a total revocation of the smoking regulations. If left to individual carriers to decide, a voluntary ban on smoking might effectively solve the problem. However, under present conditions aboard aircraft, the fire hazard is simply too great to risk the surreptitious smoker.

Sincerely,



Delfina R. Mott
Director of Safety

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A. J. STEVENS

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