

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

H. RAY LAHR,

Plaintiff,

v.

NATIONAL TRANSPORTATION  
SAFETY BOARD, et al.,

Defendants.

CV 02-8708-AHM (RZx)

DECLARATION OF DENNIS A. CRIDER

I, Dennis A. Crider, am over the age of eighteen (18) years, have personal knowledge of the statements to which I am attesting, and am competent to attest to the information presented.

I declare as follows:

BACKGROUND

1. I am employed as a National Resource Specialist for Vehicle Simulation in the Vehicle Performance Division of the Office of Research and Engineering for the National Transportation Safety Board (NTSB). I have held this position since the early part of 2002. I joined the NTSB in October of 1995 as an Aerospace Engineer, specializing in Vehicle Performance, and continued in this position until early 2002. My principal role is to determine the motion of a vehicle, such as an airplane or submarine, through the accident sequence and to determine what caused that motion.

2. On July 17, 1996, a Boeing 747 crashed into the Atlantic ocean about 8 miles south of East Moriches, New York, after taking off from John F. Kennedy International Airport. This flight was a regularly scheduled flight identified as TWA flight 800.

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requires information on the specific configuration (such as flap setting and landing gear position) of the flight, as well as the particular aircraft's weight and center of gravity.

12. The program also requires some basis for guiding the aircraft. In the case of TWA flight 800, this information was obtained from radar data.

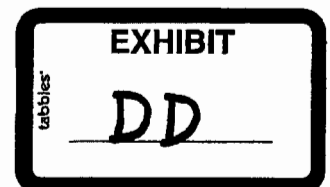
13. Boeing provided the aerodynamic, mass properties and engine characteristics of the Model 747-100 aircraft in two configurations: the baseline and a hypothetical aircraft missing its front fuselage. This included data such as the thrust produced by the engines, and data to determine the coefficient of drag (the force that opposes the plane's forward movement, the opposite to thrust), the coefficient of lift (the force perpendicular to airflow that allows the plane to rise, the opposite force to gravity), and the coefficient of pitching moment (the "force" that pitches the nose up or down), which are specific to the design of the Boeing 747 aircraft. I learned that Boeing was providing this information to the Central Intelligence Agency (CIA), as well as developing its own basic estimate of the flight path, so Boeing then included the NTSB on the routing of these data.

14. Boeing provided all data in document form, and all pages were marked as "Boeing Proprietary" and/or "Preliminary." I understood that these data provided critical information about the physical attributes and responses of the 747 aircraft, and that these data were highly valuable to Boeing. Not only do these data reflect the design characteristics of the 747, but these data typically are part of a simulator training package, and the cost of these packages often is nearly one million dollars (\$1,000,000).

15. I believe that releasing this information to the public would provide a competitor with this highly sensitive data without the financial and skill commitment required by Boeing in creating it.

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44. I have no other potentially responsive records to Plaintiff's July 31, 2002 FOIA request, and I know of no other members of the NTSB staff who would have potentially responsive records.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on this 2 day of October, 2003 in Washington, DC.

Dennis A. Crider  
Dennis A. Crider  
National Resource Specialist, Vehicle Simulation

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