

Air Transport Association

Ref. 99nm18

March 27, 2000

U.S. Department of Transportation Dockets,
Docket No. FAA-1999-6411,
400 Seventh Street, SW.,
Room Plaza 401,
Washington, DC 20590.

Ladies and Gentlemen:

Subject: Fuel Tank System Design Review, Flammability Reduction, and Maintenance and Inspection Requirements. - Notice of Proposed Rulemaking

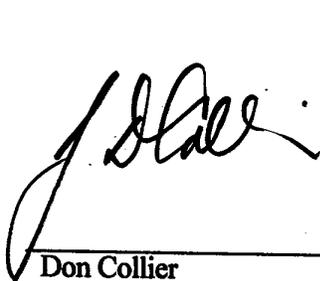
FAA has issued an Notice of Proposed Rulemaking [NPRM] which if adopted, would require manufacturers of specified transport category airplanes to submit substantiation to the FAA that the current designs of the fuel tank systems on existing airplanes precludes the existence of ignition sources within the airplane fuel tanks. It would also require the affected manufacturers to develop specific fuel tank system maintenance and inspection instructions for any items in the fuel tank system that are determined to require repetitive inspections or maintenance, to assure the safety of the fuel tank system. In addition, the proposed rule would require operators of these specified airplanes to incorporate FAA approved fuel tank system maintenance and inspection instructions into their current maintenance or inspection programs. The rule also contains enhanced requirements for future design of fuel tank systems to minimize development of flammable vapors in tanks or to mitigate the hazard of such vapors.

The attached document is submitted in response to the FAA's request for comments on the NPRM. The document represents the consolidated comments of the worldwide aviation industry as represented by:

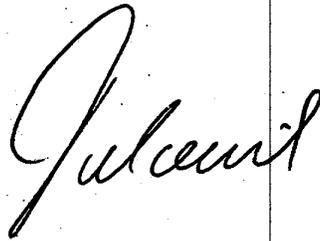
ATA [Air Transport Association of America]
AEA [Association of European Airlines]
AAPA [Association of Asia Pacific Airlines]
AECMA [Association of European Airplane Manufacturers]
AIA [Aerospace Industries Association]

This single document is submitted as an indication of the industry's solidarity regarding the proposals in the NPRM. As such, we request that the FAA treat the document as a response from each and every member of the associations noted above.

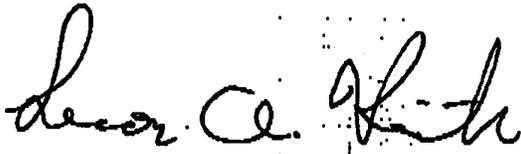
We thank you for the opportunity to provide information on this very important aviation safety issue.



Don Collier
Vice President
Engineering Maintenance &
Materiel
Air Transport Association



Peter Malanik
General Manager
Technical &
Operations
Association of European Airlines



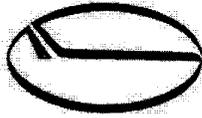
Leroy Keith
Technical Director
Association of Asia Pacific Airlines



Kai Kiock
Chairman, Airworthiness Committee
The European Association of Aerospace
Industries



Robert E. Robeson, Jr.
Vice President, Civil Aviation
Aerospace Industries Association



Air Transport Association of America

Aeromexico
Air Canada
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America West Airlines
Atlas Air
Canadian Airlines International
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Delta Air Lines
DHL Airways
Emery Worldwide
Evergreen International Air Lines
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Hawaiian Airlines
KLM Royal Dutch Airlines
Mexicana Airlines
Midwest Express
Northwest Airlines
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Southwest Airlines
Trans World Airlines
United Airlines
United Parcel Services
US Airways



Association of European Airlines

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Alitalia
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JAT
KLM Royal Dutch Airlines
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Swissair
TAP Air Portugal
Turkish Airlines

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All Nippon Airways
Ansett Australia
Asiana Airlines
Cathay Pacific Airways
China Airlines
Eva Air
Garuda Indonesia
Japan Airlines
Korean Air
Malaysia Airlines
Philippine Airlines
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Royal Brunei Airlines
Singapore Airlines
Thai Airways International



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The Aerostructure Corporation
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American Pacific Corporation
Analytical Graphics Inc.
Argo-Tech Corporation
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BAE SYSTEMS North America Inc.
Barnes Aerospace
The Boeing Company
Cordant Technologies, Inc.
Curtiss-Wright Flight Systems
Dowty Aerospace
Ducommun Incorporated
Dupont Company
Esterline Technologies
Fairchild Aerospace Corporation
Fairchild Fasteners
Final Analysis, Inc.
GKN Aerospace Inc.
GTE Internetworking
GenCorp
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The BFGoodrich Company
Groen Brothers Aviation, Inc.
Harris Corporation
HEICO Corporation
Hexcel Corporation
Honeywell
Hughes Electronics Corporation
ITT Industries
Interturbine Corporation
Kaman Aerospace Corporation
Kistler Aerospace Corporation
Litton Industries, Inc.
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Robinson Helicopter Company, Inc.
Rockwell Collins, Inc.
Rolls-Royce North America Inc.
Senior Flexonics Inc
Stellax Aerostructures, Inc.
Swales Aerospace
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Textron Inc.
Triumph Controls, Inc.
United Defense
United Technologies Corporation
Woodward Governor Company

The European Association of Aerospace Industries

AECMA

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Airbus Industrie
Alenia
BAE SYSTEMS Airbus
BAE SYSTEMS Regional Aircraft
Britten Norman
CASA
DaimlerChrysler Aerospace Airbus
Dassault Aviation
Fairchild Dornier
Fokker Services
MTU
Rolls-Royce
Rolls Royce Deutschland
SNECMA
Saab
and consolidated with
AAI (Austrian Aeronautics Industries group)
GEBECOMA (Belgian Aerospace Industries Association)
AAM CR (Association of the Aviation Manufacturers of the
Czech Republic)
FDAI (Foreningen for Dansk Aerospace Industri)
FAI (Finnish Aerospace Industries)
GIFAS (Groupement des Industries Françaises
Aéronautiques et Spatiales)
HAIG (Hellenic Aerospace Industries Group)
BDLI (Bundesverband der Deutschen Luft- und
Raumfahrtindustrie)
FAEI (Federation of Aerospace Enterprises in Ireland)
AIAD (Associazione Industrie per l'Aerospazio i Sistemi e la
Difesa)
LAI (Luxembourg Aerospace Industries)
NAI (Netherlands Aerospace Industries)
ADAP (Associação do Desenvolvimento Aeronáutico de
Portugal)
ATECMA (Agrupación Técnica Española de Constructores
de Material Aeroespacial)
SAI (Swedish Aerospace Industries)
SBAC (Society of British Aerospace Companies)

Also

Bombardier Aerospace
