



March 27, 2003

To: US Department of Transportation Dockets, Docket No. FAA-2002-13458.

Subject: Corrosion Prevention and Control Program (CPCP) – Notice of Proposed Rulemaking and AC.

Reference: 14 CFR Part 121, et al., Docket No. FAA-2002-13458; Notice No. 02-16.

Mr. Frederick Sobeck:

American Airlines provides the following comments to the FAA regarding the subject NPRM and AC for Docket No. FAA-2002-13458:

The proposed rule would affect our entire fleet of 825 aircraft, which includes 737, 757, 767, 777, A300-600, MD-80 and F100 aircraft. In all cases, American has implemented CPCP programs in accordance with FAA-approved manufacturer recommendations, and is controlling corrosion findings to Level 1 or better. The programs are included within our existing FAA approved maintenance programs. Our extensive experience with these programs along with experience on AD-based CPCP programs for the DC10 and 727, have shown that significant corrosion has in fact dropped considerably. At this time, based on the current interpretation of the rule, we do not believe it will have a significant impact on the maintenance programs at American. Notwithstanding, we do offer the following comments:

- Most operators of large transport aircraft (non CPCP AD) have incorporated CPCP programs in accordance with FAA approved MSG-3 maintenance programs. In many cases, these programs have been in place for some time and have developed into specific CPCP programs applicable to the airline's operating environment as they are intended to do. FAA approved MSG-3 maintenance programs when incorporated into FAA approved airline maintenance programs, should not require additional FAA approval or review provided they fully meet the compliance requirements of the proposed rule. The preamble to the rule is not fully clear in this respect. One could interpret that additional specific FAA approval is required at the PMI level for existing compliant programs, once the rule is finalized. This is redundant and could result in confusion for some operators interpreting the rule. It is very important that in the interest of safety, the rule not destroy a mature, compliant CPCP program due to generalities in the rule or Advisory Circular. A CPCP program is a firewall that becomes most effective and establishes its integrity over time, as it is validated and developed through successive inspections. Excessive reviews at non-technical levels, especially when generic ACs are present, can result in negative changes to programs.

- The definition of Level 1 corrosion should also include the following: “*Corrosion damage occurring between successive inspections that is widespread and can be reworked/blended-out well below allowable limits as defined by the manufacturer.*”. This definition has been accepted and approved by the FAA as part of many Boeing CPCP programs (i.e. 757 program), and should be included in the rule to prevent conflict with existing programs.
- Over many years, American has gained a vast amount of front-line experience with respect to corrosion and corrosion prevention. We have generated significant in-service data provided to the manufacturers, which is used to help define the current programs. In addition, with our extensive experience with aging fleets such as the DC10 and 727 aircraft, we have developed a keen understanding of the importance that overall specific structural design has to do with corrosion. This first-hand experience provides the operator with unique knowledge of corrosion and prevention methods, which is unrivaled by analytical analysis or SDR generalized review. It places the airlines in the most realistic position to define CPCP programs and their long-term development. In fact, manufacturers rely on us, through reporting and SWGs, to help properly develop manufacturer endorsed and FAA-approved programs.

In light of that experience, American must comment on the “*Description of Benefits*” and “*Benefits: A Risk Assessment*” sections of the rule. While SDR reports may indicate corrosion increasing from 1990-1997, this is probably only a consequence of increased reporting on the operator’s part due to increased awareness as aging aircraft issues rose to the forefront. The actual experience data indicates that, overall, corrosion is being controlled to safe levels better than ever before. This is exactly what would be expected as a result of all the hard work the industry and FAA has put forth over the last decade with respect to aging aircraft and CPCP. We don’t think these sections of the rule adequately recognize that. While we understand the spirit of this rule and the probable need for something like it to ensure all operators are including CPCPs, we do not believe the situation to be as critical as these sections imply, nor does it necessarily merit a description terming it “*a growing threat to aviation safety*”. In reality, the immediate unsafe conditions have been corrected through ADs and have greatly enhanced the awareness to look for emerging problems before they threaten safety. We are concerned that these sections could be misinterpreted by the lay person to indicate a very low level of confidence in existing maintenance programs and FAA oversight, which we do not believe to be true.

- American Airlines is committed to maintaining the highest standards with respect to the safety of the flying public. We understand the importance of implementing certain programs, even when they are not FAA mandated, due to their significance in improving safety. Incorporation of CPCP and DT principles have

the added benefit of significantly reducing unscheduled repairs and downtime as well. The fact that we have CPCP programs in place for non-AD mandated aircraft is testament to these beliefs. We also understand that some other operators may not incorporate such programs unless they are FAA mandated; therefore, we fully support the spirit of rules such as this one. In that same regard, however, we do not feel such generic “operational” rules should result in undue penalties to operators with good, proven maintenance programs, or result in excessive oversight and reviews to validate them.

In our view, our maintenance program is continuously available for scrutiny to our PMI. In addition, we continuously scrutinize it through our existing maintenance program processes and CASS programs, which again are approved and monitored by the FAA. We do not necessarily believe that an added layer of specific FAA oversight or approval through a generalized operational rule, provides significant benefit. In fact, it may contradict significantly with existing requirements and result in undue reporting requirements, with a resultant loss of focus on the significance of other maintenance programs. The current confusion within the industry and FAA regarding the intent and compliance methods for the Aging Airplane Safety Rule is an example.

Furthermore, the generalized operational rules do not always seem to fully encompass the intricate technical issues associated with things like CPCP and DT. Therefore, we would always recommend that the FAA carefully consider all other alternatives available or already in place (i.e. existing FAA oversight methods), to ensure implementation of programs, prior to issuing generalized “operational” rules. In addition, we would recommend the consideration of individual specific ADs as well, which generally result in less ‘global’ issues, fully consider the technical aspects, and are amendable by AMOCs through a well defined process if necessary. Finally, we encourage the FAA to develop a clear consensus and understanding of generalized “operational” rules between the ACO groups and Flight Standards, before these rules are implemented.

In closing, we would like to thank the FAA for the opportunity to comment on this subject.

Best Regards,

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