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U.S. Department of Transportation
Federal Aviation Administration
DOT Docket Web Site
<http://dms.dot.gov>

Re: Docket Number FAA-2004-17681, Fuel Tank Safety Compliance Extension (Final Rule) and Aging Airplane Program Update (Request for Comments); Final Rule

To Whom It May Concern:

The Association of Asia Pacific Airlines (AAPA) appreciates this opportunity to submit comments on the Federal Aviation Administration's (FAA) Final Rule for Fuel Tank Safety Compliance and Aging Airplane Program Update. AAPA is the principal trade and service organization for major scheduled air carriers in the Asia Pacific region¹.

We take note that the FAA has extended the period for comment from interested parties for those items within Docket Number FAA-2004-17681, addressing the Aging Airplane Program Update. Consequently, our comments hereafter will only address the FAA Final Rule for Fuel Tank Safety Compliance.

First, and foremost, AAPA appreciates and supports the FAA's final rule to extend the date for operators to comply with the special maintenance program requirements for transport airplane fuel tanks systems from December 6, 2004 to December 16, 2008.

The AAPA takes note that the FAA expects that the realignment of compliance dates of the Aging Airplane Program and the Fuel Tank Safety Rule will result in:

- (1) Enhanced safety by causing inspections to be focussed on the same area of an airplane at the same time and reducing the need to disturb airplane systems repeatedly;
- (2) Fewer service disruptions by reducing the number of times an airplane has to be removed from service to perform such inspections; and

¹Royal Brunei Airlines, EVA Airways, China Airlines, Cathay Pacific Airways, Garuda Indonesia, Japan Airlines, Dragonair, Korean Air, Malaysia Airlines, All Nippon Airways, Air New Zealand, Asiana Airlines, Philippine Airlines, Qantas Airways, Singapore Airlines, Thai Airways International, Vietnam Airlines.

- (3) Significantly lower compliance costs for operators due to efficiencies associated with performing multiple inspections at the same time

It is recognised that further complex analyses is required by the design approval holders which will be the basis of future maintenance and inspection programs The FAA is urged to use these three points as the basis for criteria when developing maintenance and inspection tasks.

It is acknowledged that a significant amount of effort by the FAA and JAA, and in the future EASA, has gone into Fuel Tank Safety and Aging Airplane program harmonisation. AAPA emphasises the further need for harmonisation on these issues so that Design Approval holders and operators are able to fully understand the requirements and thereby jointly develop the maintenance and inspection programs needed to ensure timely compliance and one consolidated program.

Thank you again for the opportunity to comment on this Final Rule. We trust you find our comments helpful. Please let us know should you have any questions regarding them.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Eran-Tasker', with a long horizontal flourish underneath.

MARTIN ERAN-TASKER
Technical Director
AAPA

¹Royal Brunei Airlines, EVA Airways, China Airlines, Cathay Pacific Airways, Garuda Indonesia, Japan Airlines, Dragonair, Korean Air, Malaysia Airlines, All Nippon Airways, Air New Zealand, Asiana Airlines, Philippine Airlines, Qantas Airways, Singapore Airlines, Thai Airways International, Vietnam Airlines.