



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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Docket Management Facility
U.S. Department of Transportation
400 Seventh Street SW.
Nassif Building
Room PL-401
Washington, DC 20590

Subject: Airworthiness Directives; Boeing Model 737-200, 737-300, 737-400, 737-500, 737-600, 737-700, 737-800, 737-900, 757-200, and 757-300 Series Airplanes; and McDonnell Douglas Model DC-10-10, DC-10-10F, DC-10-30, DC-10-30F, DC-10-40, MD-10-10F, MD-10-30F, MD-11, and MD-11F Airplanes; Notice of proposed rulemaking (NPRM).

Ladies and Gentlemen:

The Air Line Pilots Association, International (ALPA), representing the safety interests of over 64,000 professional airline pilots flying for 42 airlines in the United States and Canada, has reviewed the subject document and offers the following.

The FAA proposes to supersede an existing airworthiness directive (AD) that applies to certain transport category airplanes. That AD currently requires modification of the reinforced flight deck door. This proposed AD would expand the applicability of the existing AD and require other actions related to the reinforced flight deck door. These other actions include modifying the door, inspecting and modifying wiring in the area, and revising the maintenance program to require more frequent testing of the decompression panels of the flight deck door. This proposed AD is prompted by reports of discrepancies with the reinforced flight deck door.

The FAA is proposing this AD to prevent inadvertent release of the decompression latch and consequent opening of the decompression panel in the flight deck door, or penetration of the flight deck door by smoke or shrapnel, any of which could result in injury to the airplane flightcrew. This proposed AD would also find and fix wire chafing, which could result in arcing, fire, and/or reduced controllability of the airplane.

ALPA supports the intent of the subject NPRM and the language of the newly proposed AD.

ALPA appreciates the opportunity to comment on the subject NPRM.

Sincerely,

Joseph M. Bracken
Senior Staff Engineer
Engineering & Air Safety Department

JB:ak