



AIR TRANSPORT ASSOCIATION

October 18, 2004

Docket Management Facility,
U.S. Department of Transportation,
Attention: Docket No. FAA-2004-18997, Directorate Identifier 2004-NM-19-AD
400 Seventh Street SW.,
Nassif Building, Room PL-401,
Washington, DC 20590.

Subject: A300B737 Body Station 291.5 Doorstop Intercostal Strap – Additional Comments to Proposed Rule

Ladies/Gentlemen:

FAA proposes to adopt a new airworthiness directive (AD) for certain Boeing 737-100, -200, -200C, -300, -400, and -500 series airplanes. This proposed AD would require repetitive detailed and eddy current inspections to detect cracking of the frame web around the cutout for the doorstop intercostals strap at the aft side of the Body station 291.5 frame at stringer 16R, and corrective actions if necessary. ATA appreciates the opportunity to further comment on this proposed rule.

Our members generally support the intent of the rulemaking; however, additional review and clarification would be desirable on the attached comment. Specifically:

- Terminating Action – It would be helpful if terminating action instructions were provided to eliminate the need for the repeat inspections or include these inspections in the structural inspection document instructions.

Your serious consideration of these observations and comments would be greatly appreciated.

Sincerely,

Robert Peel
Director of Quality
Air Transport Association

Attachments (1)

■
AIR TRANSPORT ASSOCIATION OF AMERICA, INC.

1301 PENNSYLVANIA AVENUE, NW SUITE 1100 WASHINGTON, DC 20004-1707
202.626.4000 www.airlines.org

Alaska Airlines

8 October 2004

Air Transport Association of America
1301 Pennsylvania Ave. NW
Suite 1100
Washington, DC 20004-1707

Attention: Mr. Robert Peel
Director of Quality

Subject: B737-CL – BS291.5 Doorstop Intercostal Strap - Proposed Rule

Reference: (A) Memorandum No. 04-AD-348
(B) Docket 2004-NM-19-AD
(C) Boeing Service Bulletin 737-53A1241, June 13, 2002

Dear Mr. Peel,

Alaska Airlines has reviewed FAA's Notice of Proposed Rulemaking 2004-NM-19-AD, and Boeing Alert Service Bulletin 737-53A1241. The NPRM as published affects our 737-200C and -400 aircraft. The proposed compliance parameters and repeat intervals will allow enough time for accomplishment at heavy maintenance visits. It would be helpful if terminating action instructions were provided to eliminate the need for the repeat inspections or include these inspections in the structural inspection document instructions.

Thank you for the opportunity to provide comments. If you have any questions, please call me at (206) 392-9700.

Sincerely,



Joseph E. Gockowski III
Interim Manager of Technical Compliance
Alaska Airlines
P.O. Box 68900-SEAMJ
Seattle WA 98168-0900