



AIR TRANSPORT ASSOCIATION

October 22, 2004

Docket Management Facility,
U.S. Department of Transportation,
Attention: Docket No. FAA-2004-19022, Directorate Identifier 2004-NM-122-AD
400 Seventh Street SW.,
Nassif Building, Room PL-401,
Washington, DC 20590.

Subject: B737 – Aft Pressure Bulkhead Webs – Comments on Proposed Rule

Ladies/Gentlemen:

FAA proposes to adopt a new airworthiness directive (AD) for certain Boeing 737-600, -700, -700C, -800 and -900 series airplanes. This proposed AD would require repetitive detailed, low frequency eddy current, and high frequency eddy current inspections of the webs of the aft pressure bulkhead at body station 1016 for cracks, and corrective action if necessary. ATA appreciates the opportunity to 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 comments. Specifically:

- Repair – The referenced Service Bulletin does not offer any repairs nor terminating action should cracks be discovered. Since the type and scope of repair is unknown until cracks are found there is no estimate given for task hours for repair or preventive modification.

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

Sincerely,

Robert Peel
Director of Quality
Air Transport Association

Attachments

Alaska Airlines

12 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-NG – Aft Pressure Bulkhead Webs – Proposed Rule

Reference: (A) Memorandum No. 04-AD-350
(B) Docket 2003-NM-122-AD
(B) Boeing Service Bulletin 737-53-1251, June 3, 2004

Dear Mr. Peel,

Alaska Airlines has reviewed FAA's Notice of Proposed Rulemaking 2003-NM-122-AD and Boeing Service Bulletin 737-53-1251. Only 737NG airplanes through line number 1166 are affected by this S/B. This total includes sixteen (16) 737-700 and six (6) 737-900 airplanes operated by Alaska Airlines. To summarize the Service Bulletin recommends 737NG operators perform a detailed, LFEC, and HFEC inspection of the aft pressure bulkhead from the aft side. This is due to cracks having been found in the dome web lap splices at the bulkhead's apex. The inspection interval is to commence at or before the accumulation of 26,000 flight cycles and is to continue at 4,000 cycle intervals.

The Service Bulletin does not offer any repairs or terminating action should cracks be discovered. As it is currently written, Boeing is to be contacted upon the detection of any cracks. Furthermore, the Service Bulletin states the aft bulkhead inspection to require 8.5 man-hours. Since the type and scope of repair is unknown until cracks are found and Boeing is contacted, there is no estimate given for task hours for repair or preventive modification.

It is the desire of Alaska Airlines that Boeing include a repair or preventive modification for those airplanes falling within the jurisdiction of this Service Bulletin, and to provide an estimated task hour total for said repair or modification.

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

Sincerely,



Joseph E. Gockowski III
Interim Manager of Technical Compliance
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