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B-H300-02-JGD-125
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Docket Management System
Docket No. FAA-2002-13438
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW.
Washington, DC 20590-0001

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DEPT OF TRANSPORTATION

Subject: Comments to Notice of Proposed Rulemaking (NPRM), "Trim Systems and Protective Breathing Equipment," Docket FAA-2002-13438, Notice No. 02-15 - 3

Reference: Federal Register publication, October 2, 2002 (67FR 61836)

Dear Sirs:

Enclosed are comments from Boeing Commercial Airplanes concerning the subject NPRM. We support the proposal in general, but have identified certain areas of the proposed text that should be revised for clarity.

Please direct any comments or questions to Ms. Jill DeMarco of this office at (425) 965-2015.

Sincerely,

Jim Draxler
Director, Airplane Certification and
Regulatory Affairs

Enclosure

**Boeing Commercial Airplanes
Comments to NPRM
Docket FAA-2002-13438, Notice No. 02-15,
“Trim Systems and Protective Breathing Equipment”**

PROPOSED §25.677, “TRIM SYSTEMS”

Requested Change 1: Remove or clarify the phrase “adjacent to trim control.”

Rationale: That phrase is obsolete for stabilizer trim because most airplanes no longer have mechanical trim wheels and cables.

Requested Change 2: Clarify whether the rule is applicable only to stabilizer trim, or to rudder and lateral trim as well.

Rationale: The rule generally addresses “trim systems.” However, the text concerning “safe takeoff range” **has traditionally** only been applied to stabilizer trim, and not to aileron or rudder trim. This is not specified in the proposed rule, however.

PROPOSED §25.1439(a), “PROTECTIVE BREATHING EQUIPMENT”:

Requested Change: Revise the proposed text in paragraph (a) that currently states:

“In addition, portable protective breathing equipment must be installed for the use of appropriate crewmembers for fighting fires in compartments accessible in flight. This includes isolated...”

to read as follows:

“In addition, portable protective breathing equipment must be installed for the use of appropriate crewmembers for fighting fires in compartments accessible in flight other than the flight deck. This includes isolated...”

Rationale: Adding the additional text as indicated above clearly specifies that the last sentence of proposed §25.1439(a), which requires protective breathing equipment (PBE) for the maximum number of occupants, does NOT apply to the flight deck. The JAA has previously interpreted this part of the rule as not applying to the flight deck. However, if taken literally, the proposed requirement could apply to the flight deck, thus requiring up to four PBEs on the flight deck; this clearly is not the intent of the rule.