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AEROSPACE

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U.S. Department of Transportation Dockets
Docket No. FAA-19995401 -6
400 Seventh Street SW
Room Plaza 401
Washington, DC 20590

Dear Madam/Sir:

The following questions and comments are supplied in response to Proposed Rule 14 CFR Parts 119, 121, et al. "Aging Airplane Safety".

1. Page 16309 of the NPRM states, "Operators who choose to engage a DAR for the necessary reviews and inspection would directly bear the costs of that work." This statement is understandable, but would an operator have to bear the costs of the DAR reviews and inspections when the applicable FAA office directs an operator to use a DAR? Experience has shown that some FAA offices, such as the Miami FSDO, routinely direct operators to seek the services of a DAR whenever the task can be accomplished by a DAR, stating that they are too busy. It would be unfair to have one operator pay for DAR services because their local FAA office will not perform the function, while other operators have the FAA perform the functions without cost to the operator.

2. It would assist the process if this NPRM and the resulting regulations include a list of what aircraft manufacturer's Inspection Programs, for which aircraft, are "Damage-Tolerant-Based Inspections".

3. The three appendixes in the subject NPRM for "Design-Life Goals" have the SD3-60 life limit listed as 28,800, when TCDS A41EU, Note 3, states that the life limit is as listed in Chapter 5 of the approved Maintenance Manual Document Ref. 360/MM. This manual states, "An economic structural limit of 57,600 flight hours or 100,000 flights (whichever occurs first) has been established. This document does require a Structural Half Life Audit at 28,800 flight hours or 50,000 flights. The referenced appendixes are: Appendix N to Part 121, Appendix B to Part 129, and Appendix G to Part 135.

Sincerely,

A handwritten signature in cursive script that reads "Robert J. Walling".

Robert J. Walling
Director - Technical Support

Enclosure: Maintenance Manual Document Ref. 360/MM, "Aircraft Life" page.

Shorts SD3-60 MAINTENANCE MANUAL

AIRCRAFT LIFE

1. Structure

Resulting from extensive structural testing and damage tolerance analysis carried out at Shorts, an operational limit has been established of **28,800** flight hours or 50,000 flights (whichever occurs first).

An economic structural **life** limit of 57,600 flight hours or 100,000 flights (whichever occurs first) has been established.

Upon reaching the operational limit of 28,800 flight hours or 50,000 flights a Structural Half Life Audit is required to be completed in accordance with Maintenance Programme Supplemental Data Supplement No. 2.

For operation beyond 28,800 flight hours or 50,030 flights structural inspections are required in accordance with Maintenance Programme Supplemental Data Supplement No. 1 which replaces in total the tabulated structural inspections detailed in Sect S-36 of the Maintenance Programme.

2. Landing gear

The current life of the landing **gear** is as listed in **5-00-02**.