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July 28, 1999

RE: Aging Airplane Inspections

U.S. Department of Transportation Dockets  
Docket No. FAA-I 999-5401 ← 19  
400 Seventh St. SW.  
Room Plaza 401  
Washington, DC 20590

To Whom it May Concern:

Eagle Canyon Airlines doing business as Scenic Airlines would like to go on record as being opposed to proposals in docket 1999-5401, as it now stands. Our reasons for opposition are as follows.

- It is and always has been the responsibility of the air carrier to ensure that the aircraft that are listed on their operation specifications are maintained in accordance with the operators inspection and maintenance program. To bring in a DAR or a FAA inspector to conduct an aircraft inspection and records review would remove some of that responsibility and open the door for added conflict between a carrier and the administrator. It would also place an unnecessary financial burden on either the operator if they choose to use a DAR or on the Federal Budget if an FAA inspector was used.
- The record items listed that would have to be made available for the DAR or FAA inspector are the very same records that a Chief Inspector and the PMI check on a regular basis.
- Also of concern is the statement on page seventeen (17), which states; "Although it is the FAA's intent to carry out records reviews and inspections to the extent that the aircraft structure is accessible during the maintenance visit, the FAA may require additional access to determine that the maintenance of the airplane's age-sensitive parts and components has been adequate and timely'. What criteria will be used to determine if additional access is required? As the statement now stands it appears that the inspector would have full authority to have an operators aircraft completely dismantled and totally disrupt the inspection schedule. Not to mention the financial burden this would place on the operator.
- The existing maintenance program for the DHC-6 (Twin Otter) is not a letter type inspection. Rather it is a Equalized Maintenance program which allows for maximum availability with the maintenance and inspection being accomplished in smaller packages with more frequent intervals. Then end result is that the aircraft are not scheduled for long periods of down time for maintenance, but the aircraft is completely and thoroughly inspected on an ongoing basis. If the NPRM is accepted as is this would require taking the aircraft out of service each five years to do a complete inspection. This would take approximately 600 man hours per aircraft and would take the aircraft out of service for eight to ten days. The cost to do the inspection and the lost revenue

would be approximately **\$40,000.00**, per aircraft. Our existing fleet size is nineteen (19) aircraft so in a five year period of time it would add **\$760,000.00**, in maintenance cost, or **\$152,000.00** per year. Another alternative would be to have a DER or FAA inspector at our facility each night when we do one of the scheduled segmented inspections. In order to have adequate coverage it would require two individuals full time. If each **DER/FAA** person made **\$60,000.00** per year it would cost us **\$120,000.00** additional each year. This would translate to approximately a 7% increase per year in maintenance costs.

- The **DHC-6** maintenance program at Eagle/Scenic Airlines is very comprehensive. All of the critical items are inspected at regular intervals and many items have a life limit and are replaced with new item at specified times. Some of these components are Wing Strut Assembly, Wing Link Assembly, Wing Link Attach Bolts, Fuselage Fane Assembly, as well as the Wing itself. The current maintenance program is completed in it's entirety every 4800 hour or approximately each four years. This is one year sooner than proposed in the document.
- Over the past ten (10) years Eagle/Scenic Airlines has flown over 250,000 flight hours without a maintenance related accident or incident. As required by regulation all critical failures and findings are documented on FAA Form 8070-I (Service Difficult Report) a copy of this form is forwarded to our PMI for his review.
- The **DHC-6** aircraft as you know is a non-pressurized aircraft and therefore is not subject to the same type of fatigue as would be a pressurized fuselage.

Eagle/Scenic Airlines would be inclined to favor a structural integrity inspection program that is approved by the FAA, and is aircraft specific, rather than a damage tolerance based program. This would be more cost effective, would keep the responsibility for airworthiness with us the air carrier, and would continue to incorporate the highest level of safety!

Sincerely yours,



Sidney Hurst  
VP Maintenance  
Eagle/Scenic Airlines

cc: David Lotterer **RAA**  
David Young Eagle/Scenic Airlines