



**MOUNTAIN AIR CARGO, INC.**

**ORIGINAL**

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US Department of Transportation Dockets  
Docket No. FAA-1999-5401 - 20  
Seventh St. SW  
Room Plaza 401  
Washington, DC 20590

Reference: Aging Aircraft NPRM (Notice 99-02)

Comments on behalf of Mountain Air Cargo, Inc., Air Carrier Certificate MTNA-123B

The Continuous Airworthiness Maintenance Program, including SIP (Structural Inspection Program) and CCP (Corrosion Control Program) currently in effect for the Fokker F-27, mandated by FAR's and Airworthiness Directives, are proven programs for safe extended operation of the Aircraft.

The NPRM states the Fokker F-27 is based on AC 91-60 and does not qualify as a damage-tolerance-based-program. This is a false statement, as the Fokker F-27 SIP, Document No. 27438, Part 1 has been declared by the FAA as having been prepared in accordance with AC 91-56. This qualifies it as an acceptable damage-tolerance-based inspection program per the NPRM. The wording associating the Fokker F-27 SIP to AC 91-60 should be removed.

The Fokker F-27 allows for incorporation of the additional inspections mandated by the NPRM at reasonable intervals. The additional burden of setting calendar times for these inspections would serve no useful purpose.

The requirement for DAR/FAA approval of the Aging Aircraft Records Review and Inspection could pose scheduling problems for large fleets. Alternatives that ease the potential problem need to be available. A suggestion would be to develop a sampling of a large fleet for DAR/FAA approval and the remaining be completed by Air Carrier personnel.

Regards

Edward L. Baxter, Jr.  
Vice-President Maintenance  
Mountain Air Cargo, Inc.