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Washington D.C.

Subject: Aging Aircraft Safety - Proposed Rule  
Docket No. F.A.A. -199-5401; Notice No. 99-02  
Rin 2120 -AE42

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To Whom It May Concern:

Air Cargo Express is a Medium Regional Part 121 Air Carrier operating DC-6 and C-46 aircraft in a scheduled all cargo operation within the state of Alaska. We serve communities from Fairbanks and Anchorage, and for some of these communities are the only means of supply of vital resources. In many of these communities we, and other aviation based means of transportation, are an integral part of their existence. At no time in the foreseeable future can it be predicted that these communities would change, or eliminate, their reliance on aviation.

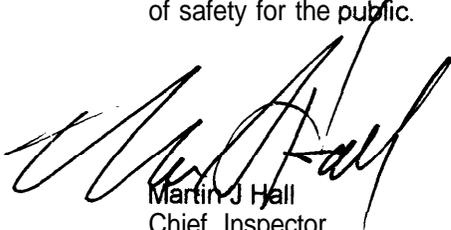
While it is entirely possible that Air Cargo Express will in it's future "upgrade" to newer aircraft, it also is very possible that we could still be operating either the DC-6 or the C-46, at least in a limited fashion, beyond the year 2010. Even in up grading, we still may not escape the probable problems that will be imposed by this NPRM as many of the aircraft we would up grade to are also aircraft that do not have "Damage Tolerance Based Inspections" in their maintenance programs. One aircraft in consideration for us is the Convair 5800, which although considered a zero time new aircraft is not designed or converted with Damage Tolerance in mind.

In review of the proposed rule, it is noted that the history of the aircraft in question must be reviewed clear back to it's delivery date. With many of our aircraft that is an impossibility. Nor could we ever be able to determine any and all in flight or landing stress's these aircraft have ever been subjected to in it's 40 to 50 year life. Even determining each and every repair ever performed can, and will, present a task that can that will be extremely difficult and expensive to performed. A number of our aircraft are ex-military aircraft, and while we did receive some records with them, we, by no means, have the complete maintenance history of any of them.

A further problem is manufacture's support in developing an acceptable program. The Curtiss company is no longer in the business of supporting their aircraft, and have not been for some 40 years. Douglas has been bought by Boeing. When recently contacted about the NPRM it was indicated that there currently was no consideration for support in this area for the DC-6, and possibly would not be for any thing older than the DC-8. This leaves the burden of development of a Damage Based Inspection Program squarely on each operator's shoulders, and it is a load that quite likely can only be meet by incurring excessive costs. In conversations with the TCDS holder for the Convair 580 it was conservatively estimated that the cost would be on the line of \$2.5M for one of their operators as the historical data felt required for development does not exist.

Also cost related is the inspections performed by F.A.A. representatives. As the cost for a DAR that would perform these inspections is estimated at 1999 costs to average \$95.00/hour, who pays for that?

Both of the aircraft operated by Air Cargo Express, and the possible replacements, have a proven history and there have been no known accident or incident based strictly on structural failure. Air Cargo Express is most certainly interested in Aviation Safety, both on the human as well as financial levels, however we are adamantly opposed to this approach as set forth in the NPRM in question. We feel that an approach based more on the proven service life will not place an undue financial burden on the operators of older aircraft and still provide a more than reasonable margin of safety for the public.



Martin J Hall  
Chief Inspector  
Air Cargo Express