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1999-5251

**Date:** 8/10/99 5:56 PM  
**Sender:** "Luis Henrique M?dici Colus" <luiscolus@cyberspace.com.br> ("Luis Henrique MTdici Colus" <luiscolus@cyberspace.com.br>)  
**To:** 9-NPRM-CMTS  
**Priority:** Normal  
**Subject:** Re: Comments about NPRM 99-02 FAQ-99-5401-44

Dear Sirs,

This is the second trying, but the original document was sent by FAX in Aug. c2, 1999.

I've removed some macros with the CTA identification for this second tentative, let's see if it works better now.

Rgds, Colus.

9-NPRM-CMTS wrote:

> Mr. Colus :  
>  
> We were unable to open the attachment. Please resend it.  
>  
> Thank you.  
>  
> Jean Casciano  
>  
> \_\_\_\_\_Reply Separator  
> Subject: Comments about NPRM 99-02  
> Author: <luiscolus@cyberspace.com.br>  
> Date: 7/30/99 10:36 AM  
>  
> Dear sirs,  
>  
> I'm sending electronically the same message we will fax you later regarding  
to the NPRM 99-02 "Aging Airplane Safety".

Best Regards, Luis H. Colus

\_\_\_\_\_  
CyberSpace's Webmail System  
<http://www.cyberspace.com.br/>  
Dear sirs,

I'm sending electronically the same message we will fax you later regarding  
> to the NPRM 99-02 "Aging Airplane Safety".  
>  
> Best Regards, Luis H. Colus

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CyberSpace's Webmail System  
<http://www.cyberspace.com.br/>  
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> -----  
Name: f - comments about aging

1999 AUG 13 A 10:19  
OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET

NPRM.doc

> f - comments about aging NPRM.doc Type: Winword File  
(application/msword)

Encoding: base64

> Name: RFC822.TXT  
> RFC822.TXT Type: Plain Text (text/plain)  
> Encoding: 7bit



f - comments about  
aging NPRM2 doc



RFC822 TXT

Dear Sirs,

The following comments apply to the Docket No. FAA- 1999-5401; Notice No. 99-02, Dated April 2, 1999, related to "Aging Airplane Safety":

CTA supports the FAA initiative in establishing this aging program, and we concur with the general policy presented.

In addition to that, we would like to open a discussion related to a particular aspect of the worldwide aging fleet. We have a concern about the aging of airplanes that are being converted from PAX to Cargo versions, which would be more properly addressed in another dedicated guidance material to these kind of freighter conversions. However, since we understand that the freighter conversions are normally conducted in old airplanes, some relation could be established already into the scope of the present Notice.

The fatigue mass configurations, used in the aircraft design phase, are normally established based in statistical data from different publications. One of the most used parameters is the "passenger load factor", which varies from each category of aircraft, and represents the percent that revenue occupied seats are of available aircraft seats capacity, representing the proportion of seats capacity that is actually utilized.

This occupation load factor is expected to be much higher for Cargo/Freight, because it does not depend solely on the passengers availability to take the airplane, but also accommodate some cargo which can be waiting for a "window" to be on board. As an illustration of this aspects, the Regional Aviation are designed based in an average passenger load factor around 60% to 70%, which can be drastically increased during cargo operations.

The result of this different kind of occupation can be a higher average for fatigue mass configurations, which, if had been used during the design phase, could have resulted in shorter inspection intervals (for damage tolerance designs) or lower life limits (for safe life designs). Once we recognize that, during a PAX to Cargo conversion, the development of additional damage tolerance calculations can be conducted (if conducted!!!) by an STC holder, and this STC holder may not have access to the original technical data (as mentioned in page 16301 of the Notice), we realize that this different occupation load factor can be overseen.

Our suggestion to cover this different kind of occupation is:

1. When modifying an airplane through STC for cargo conversion, to reassess the entire airplane structural inspections, not only restricting to the localized modified points; and
2. Regarding the "aging program inspections", create another category related to full cargo modified aircraft, in order to require shorter intervals for the baseline inspection programs, unless enough design precautions are taken to account for the increased aircraft utilization load factor, during the STC's substantiation.

My Best Regards, Eng. Luis H. Colus