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OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET

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Date: 8/2/99 6:28 PM  
Sender: Clive Neale <cn@atlantique.source.co.uk>  
To: 9-NPRM-CMTS  
Priority: Normal  
Subject: DOCKET No FAA-1 999-540 1

Dear Sirs

REF DOCKET No FAA-1999-5401; NOTICE No 99-02 AGING AIRPLANE SAFETY

Atlantic Airlines and Channel Express currently operate ten L188 Electra aircraft which we believe to be the largest fully operational public transport Electra fleet remaining. In response to invited comments regarding the above referenced NPRM, Atlantic Airlines wish to respond as follows:

With reference to the ultimate paragraph, column one, page 16302 which lists those aircraft to which non-damage tolerance inspection techniques have been applied via the implementation of FAA mandated SID programs.

We have investigated the basis that was used for the generation of the Lockheed L188 SID program and have confirmed via report LR 30238 that the program was generated upon Damage Tolerant Inspection principles and not solely based upon empirical service data.

We therefore believe that the L188 is incorrectly cited within this paragraph with regards to the basis of it's SID program and consequently does not fall into the category of Non-damage-tolerance-based SIP's.

We would also like to point out that Lockheed have stated that they do not consider it a viable exercise to develop the additional damage tolerance based inspections and procedures proposed in the NPRM.

Consequently, it would no longer be viable to invest in the forthcoming European avionics requirements (eg: 8.33 MHZ channel spacing, FM immunity, TCAS Version 7 and Mode S transponders) in the light of the remaining life of the aircraft under this proposal. Under these circumstances, the mandatory implementation dates of these avionics upgrades would cause these aircraft to be removed from service at the end of this year.

We believe that this is neither the intent of the notice nor justified or reasonable.

Should you require further information please do not hesitate to contact us.

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