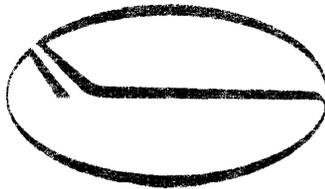


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Air Transport Association

DEPT OF TRANSPORTATION

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December 31, 1999

U.S. Department of Transportation Dockets  
Docket No. FAA-1999-5401-81  
400 Seventh Street NW  
Room Plaza 401  
Washington DC 20590

Re: FAA Notice No. 99-02, Aging Airplane Safety; Proposed Rule at 63 FR 16298,  
April 2, 1999

Ladies/Gentlemen:

The following comments supplement the comments submitted to the subject docket by ATA on October 18, 1999.

Among our comments filed on October 18, 1999, ATA offered alternative proposed language for § 121.368 (b), to wit:

**"(b) At each heavy maintenance check of each aircraft that has been in service for more than 14 years, the air carrier will assure that the Administrator is provided timely notice of opportunity to inspect the aircraft parts and components, and their corresponding maintenance records, that are scheduled for inspection and/or maintenance during the check. At the end of 90 days following the return to service of the aircraft after the heavy maintenance check, the air carrier shall provide a report to the Administrator summarizing the findings and conclusions related to aging aircraft effects from the heavy maintenance check and maintenance activities in the preceding interval since the prior heavy maintenance check. The report shall include a summary of the experiences of like aircraft in the air carrier's fleet with respect to aging phenomena. The FAA shall review the report and provide the air carrier, within 90 days after it is received, a written acknowledgement of its acceptability or a statement of changes needed in order to make it acceptable."**

One member airline has requested a further amendment to the proposed language to make it read:

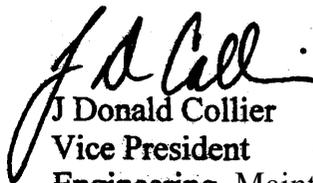
**"(b) At each heavy maintenance check of each aircraft that has been in service for more than 14 years, the air carrier will assure that the Administrator is provided**

timely notice of opportunity to inspect the aircraft parts and components, and their corresponding maintenance records, that are scheduled for inspection and/or maintenance during the check. **Within 60 days after the end of each 90 days period, for aircraft that completed heavy maintenance checks during the 90 days period, the air carrier shall provide a report to the Administrator. The report shall summarize, for like aircraft in the air carrier's fleet, the findings and conclusions related to aging phenomena from the heavy maintenance checks and maintenance activities in the preceding interval since each prior heavy maintenance check.** The FAA shall review the report and provide the air carrier, within 90 days after it is received, a written acknowledgement of its acceptability or a statement of changes in order to make it acceptable.”

This member airline reasons that one report for each 90 days is less burdensome and impractical than multiple reports, one for each aircraft. Also, reporting in this fashion will probably be preferred by the FAA as trends can more easily be depicted in quarterly summary reports than in individual aircraft visit reports. Such a report would still be redundant to the SSID, CPCP and Repair Assessment reporting and the continuous airworthiness maintenance program analysis already mandated by the FAA for aging large transport aircraft.

Thank you for considering these supplemental comments.

Sincerely,



J Donald Collier

Vice President

Engineering, Maintenance & Materiel

cc: Frederick Sobeck  
Aircraft Maintenance Division (AFS-300)  
Flight Standards Service  
Federal Aviation Administration  
800 Independence Avenue SW  
Washington DC 20591