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# ORIGINAL



United Parcel Service of America, Inc.

January 5, 2000

U.S. Department of Transportation  
Dockets, Docket No. **FAA-1999-6411** - b  
400 Seventh Street SW, Room Plaza 40 1  
Washington, DC 20590

DEPT. OF TRANSPORTATION  
DOCKET # 1999-6411  
06 JUN 10 PM 2000

**Re:** Docket No. **FAA-1999-6411**; Notice No. **99-18**  
Transport Airplane Fuel Tank System Design Review, Flammability Reduction and  
Maintenance and Inspection Requirements

Dear Sir or Madame:

With respect to the above referenced **SFAR**, United Parcel Service Co. (UPS) has the following concerns/comments:

1. The timetable for implementation reads that within **12 months from the effective** date of the rule, the **manufacturer** will conduct the safety review and develop the compliance documentation and any required maintenance and inspection instructions. It would also require the operators to incorporate an FAA-approved **long-term** fuel tank system maintenance and inspection program within **18 months** from the effective date of the proposed rule. This gives an operator only six months **beyond** that date to develop and obtain **Aircraft Certification Office (ACO)** approval of a **fuel** tank maintenance program.

Until such time as the individual requirements of this program are known, we believe that the establishment of the **18-month** timeframe from the effective date is premature.

2. With respect to the cost of implementing the program, UPS believes that the manhours specified in the **SFAR** are low. UPS believes that a more realistic value will be **300-500** manhours every **9-11** years to perform an adequate in-tank maintenance program. This cost does not include component replacement (once identified by Boeing).

These are the comments that UPS can offer at this time until the proposed Advisory Circular revisions are issued, and comments are invited by the FAA.

Your response to these comments will be greatly **appreciated**.

Sincerely,

John R. **Erleben**  
Manager, **727/747** Fleet Operations Group

**JRE:MG:ssb**

**cc:** Bill Scott  
Mario Gonzalez