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Date: 6/10/99 3:06 PM  
Sender: "Rolls-Royce Airworthiness Department" <gjg68@dial.pipex.com>  
To: 9-NPRM-CMTS  
Priority: Normal  
Subject: Docket 29547 - 207 Minute ETOPS Approval Criteria

Comments on FAA Docket No 29547  
207 Minute Extended Range Operations With Two Engine Aircraft (ETOPS)  
Approval Criteria

1999 JUN 16 PM 5:12  
OFFICE OF THE  
CHIEF COUNSEL  
RULES DOCKET

- 1.0 Rolls-Royce supports the principle of permitting an extension of to the existing ETOPS limit of 180 minutes.
- 2.0 Rolls-Royce has restricted its comments on the docket to propulsion related issues only as follows :-
  - 2.1 The requirement to ensure that the engine installation has an adequate oil supply margin to support a 207 minute ETOPS flight plus necessary allowances, seems unnecessary when considering the potential maximum flight time of the aircraft type under review. The issue would only become of real concern if a powerplant should exhibit considerably greater oil consumption at Maximum Continuous rating than at cruise. To protect against this (albeit unlikely) scenario, it may be prudent to leave the paragraph as drafted.
  - 2.2 Rolls-Royce supports the proposed engine Inflight Shutdown (IFSD) target level of 0.019 / 1000 engine hours for 207 minutes ETOPS as being consistent with the agreed reliability criteria for all ETOPS operation. We would not support any proposal to lower this target based on a logic that today's engines are currently achieving substantially better reliability than the target.
  - 2.3 Rolls-Royce notes that the intent is to include the 207 minutes policy in the next reissue of Advisory Circular AC120-42A. This reissue should be expedited and be considered as a first step towards a general tidy up of the ETOPS regulations including cascading relevant ETOPS practices into other regulations.

Engineer,  
plc, Derby, UK

P Harvey, Airworthiness  
Rolls- Royce

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