Air Transport Association

Ref: 99nm18

March 27, 200

U.S. Department of Transportation Dockets,
Docket No. **FAA**-1999-6411,
400 Seventh Street, SW.,
Room Plaza 401,
Washington, DC 20590.

Ladies and Gentlemen:

**Subject: Fuel Tank System Design Review, Flammability Reduction, and Maintenance and Inspection Requirements. - Notice of Proposed Rulemaking**

FAA has issued an Notice of Proposed Rulemaking [NPRM] which if adopted, would require manufacturers of specified transport category airplanes to submit substantiation to the FAA that the current designs of the fuel tank systems on existing airplanes precludes the existence of ignition sources within the airplane fuel tanks. It would also require the affected manufacturers to develop specific fuel tank system maintenance and inspection instructions for any items in the fuel tank system that are determined to require repetitive inspections or maintenance, to assure the safety of the fuel tank system. In addition, the proposed rule would require operators of these specified airplanes to incorporate FAA approved fuel tank system maintenance and inspection instructions into their current maintenance or inspection programs. The rule also contains enhanced requirements for future design of fuel tank systems to minimize development of flammable vapors in tanks or to mitigate the hazard of such vapors.

The attached document is submitted in response to the FAA's request for comments on the NPRM. The document represents the consolidated comments of the worldwide aviation industry as represented by:

ATA [Air Transport Association of America]
AEA [Association of European Airlines]
AAPA [Association of Asia Pacific Airlines]
AECMA [Association of European Airplane Manufacturers]
AIA [Aerospace Industries Association]

This single document is submitted as an indication of the industry's solidarity regarding the proposals in the NPRM. As such, we request that the FAA treat the document as a response from each and every member of the associations noted above.

We thank you for the opportunity to provide information on this very important aviation safety issue.

**Air Transport Association of America**
1301 Pennsylvania Ave., NW — Suite 1100 Washington, DC 20004-1707
(202) 626-4000

Don Collier
Vice President
Engineering Maintenance &
Materiel
Air Transport Association

Peter Malanik
General Manager
Technical &
Operations
Association of European Airlines

Leroy Keith
Technical Director
Association of Asia Pacific Airlines

Kai Kiock
Chairman, Airworthiness Committee
The European Association of Aerospace
Industries

Robert E Robeson, Jr.
Vice President, Civil Aviation
Aerospace Industries Association

Air Transport Association of America

Aeromexico
Air Canada
Airborne Express
Alaska Airlines
Aloha Airlines
American Airlines
American Trans Air
America West Airlines
Atlas Air
Canadian Airlines International
Continental Airlines
Delta Air Lines
DHL Airways
Emery Worldwide
Evergreen International Air Lines
Federal Express
Hawaiian Airlines
KLM Royal Dutch Airlines
Mexicana Airlines
Midwest Express
Northwest Airlines
Polar Air Cargo
Southwest Airlines
Trans World Airlines
United Airlines
United Parcel Services
US Airways

AEA
Association of European Airlines

Adria Airways
Aer Lingus
Air France
Air Malta
Alitalia
Austrian Airlines
Balkan
British Airways
British Midland
Cargolux
Croatia Airlines
CSA
Cyprus Airways
Finnair
Iberia
Icelandair
JAT
KLM Royal Dutch Airlines
Lufthansa
Luxair
Malev
Olympic Airways
Sabena
SAS
Swissair
TAP Air Portugal
Turkish Airlines

ASSOCIATION OF ASIA PACIFIC AIRLINES

Air New Zealand
All Nippon Airways
Ansett Australia
Asiana Airlines
Cathay Pacific Airways
China Airlines
Eva Air
Garuda Indonesia
Japan Airlines
Korean Air
Malaysia Airlines
Philippine Airlines
Qantas Airways
Royal Brunei Airlines
Singapore Airlines
Thai Airways International

Aerospace Industries Association

AAI Corporation
The Aerostructure Corporation
Alliant Techsystems Inc.
American Pacific Corporation
Analytical Graphics Inc.
Argo-Tech Corporation
B.H.Aircraft Company, Inc.
BAE SYSTEMS North America Inc.
Barnes Aerospace
The Boeing Company
Cordant Technologies, Inc.
Curtiss-Wright Flight Systems
Dowty Aerospace
Ducommun Incorporated
Dupont Company
Esterline Technologies
Fairchild Aerospace Corporation
Fairchild Fasteners
Final Analysis, Inc.
GKN Aerospace Inc.
GTE Internetworking
GenCorp
General Dynamics Corporation
General Electric Company
The BFGoodrich Company
Groen Brothers Aviation, Inc.
Harris Corporation
HEICO Corporation
Hexcel Corporation
Honeywell
Hughes Electronics Corporation
ITT Industries
Interturbine Corporation
Kaman Aerospace Corporation
Kistler Aerospace Corporation
Litton Industries, Inc.
Lockheed Martin Corporation
MOOG Inc.
The Nordam Group
Northrop Grumman Corporation
Omega Air, Inc.

Parker Hannifin Corporation
Raytheon Company
Robinson Helicopter Company, Inc.
Rockwell Collins, Inc.
Rolls-Royce North America Inc.
Senior Flexonics Inc
Stellex Aerostructures, Inc.
Swales Aerospace
TRW Inc.
Teleflex, Inc./TFX Sermatech
Textron Inc.
Triumph Controls, Inc.
United Defense
United Technologies Corporation
Woodward Governor Company

**The European Association of Aerospace Industries**

AECMA

Aerospatiale Matra
Airbus Industrie
Alenia
BAE SYSTEMS Airbus
BAE SYSTEMS Regional Aircraft
Britten Norman
CASA
DaimlerChrysler Aerospace Airbus
Dassault Aviation
Fairchild Dornier
Fokker Services
MTU
Rolls-Royce
Rolls Royce Deutschland
SNECMA
Saab
and consolidated with
AAI (Austrian Aeronautics Industries group)
GEBECOMA (Belgian Aerospace Industries Association)
AAM CR (Association of the Aviation Manufacturers of the Czech Republic)
FDAI (Foreningen for Dansk Aerospace Industri)
FAI (Finnish Aerospace Industries)
GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)
HAIG (Hellenic Aerospace Industries Group)
BDLI (Bundesverband der Deutschen Luft- und Raumfahrtindustrie)
FAEI (Federation of Aerospace Enterprises in Ireland)
AIAD (Associazione Industrie per l'Aerospazio i Sistemi e la Difesa)
LAI (Luxembourg Aerospace Industries)
NAI (Netherlands Aerospace Industries)
ADAP (Associação do Desenvolvimento Aeronáutico de Portugal)
ATECMA (Agrupación Tecnica Española de Constructores de Material Aerospacial)
SAI (Swedish Aerospace Industries)
SBAC (Society of British Aerospace Companies)

# Also

Bombardier Aerospace