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United Parcel Service 1400 North Hurstbourne Parkway, Louisville, KY 40223

March 27, 2000

DEPT. OF TRANSPORTATION
DOCKETS
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U.S. Department of Transportation Dockets
Docket No. **FAA-1999-6411-30**
400 Seventh Street S.W.
Room Plaza 401
Washington, D.C. 20590

Subject: Comments to Docket No. **FAA-1999-6411**, Notice No. **99-SFAR** on Transport Airplane Fuel Tank System Design Review, Flammability Reduction and Maintenance and Inspection Requirements.

- References: 1. **ATA** Letter No. **99nm18**, "Fuel Tank System design Review, Flammability Reduction, and Maintenance and Inspection Requirements. - Notice of Proposed Rulemaking", dated March 27, 2000
2. FAA Notice of Proposed Rulemaking (**NPRM**) Docket No. **FAA-1999-6411**, Notice No. **99-1**, dated October 26, 1999

Ladies and Gentlemen,

United Parcel Service Co. (UPS) has participated in the development of the subject consolidated worldwide aviation industry response to the subject **NPRM**. We fully support all comments.

To emphasize our general concerns, we wish to offer the following observations:

1. The 10 year operator's cost is considered to be greatly underestimated in our opinion. The result of this will escalate the proposed man-hours and drive the cost. Areas to consider:
 - a. Maintenance tasks that might be required at other than those heavy maintenance checks when tanks are normally scheduled to be open,
 - b. System modifications, which might be required, and
 - c. Hard time or replacement of components, which might be required.
2. The compliance time **frame** is very short in view of a lack of resources and expertise available at **OEMs** to promptly perform the required design reviews and develop the maintenance and inspection programs for all the affected fleets.

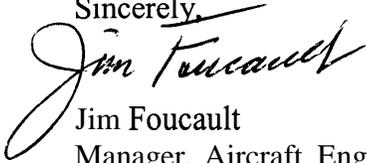


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3. The FAA has again not communicated sufficiently with the airlines and STC holders to establish evaluation criteria for non-OEM modifications. A recent example of this lack of proper communication has been the 727/737 SSID A.D. 98-11-03. We do not want to repeat this problem.

UPS sincerely appreciates the opportunity to comment and encourages the FAA to reevaluate the NPRM in view of the information presented in the industry response and in the above items.

Sincerely,

A handwritten signature in black ink that reads "Jim Foucault". The signature is written in a cursive style with a large, looping initial "J".

Jim Foucault
Manager, Aircraft Engineering

JF:WY:mp

c.c. Robert Peel, Air Transport Association (ATA) of America