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Student Coahilitation For "Safety in the Sky's"

11200 S.W. 8th ST.

University Park, FL 33199

March 26th, 2000

U.S. Department of Transportation

400 Seventh Street, S.W.

Room Plaza 401

Washington, DC 20590

Reference: **FAA Docket No. FAA-1999-6411**; ⁴⁰**Notice No. 99-18**

Dear Sirs:

The Student Coahilitation submits these comments in response to Notice of Proposed Rule Making regarding ***Transport Airplane Fief Tank System Design Review***.

As we are constantly looking for safer skies we applaud the FAA's involvement with this rule. However, in light of several criteria in the Proposed Rule we find that some of the cost estimations, inspection intervals, and time for compliance may be too costly for the Aviation Industry to absorb while maintaining safe and cost effective standards in the skies.

After thorough research we found that only 8 airplane accidents since 1958, have been linked to fuel system deficiencies.

We understand that the FAA is placed in a thus difficult position as the “Mediators of the Skies.” However, with regards to proposed rule **FAA-1999-6411** we offer the following comments:

- The first is the proposed **12-month** compliance with the rule. We ask that you extend this period to allow the Airline Industry to adapt and contour itself to these criteria you propose. We believe that the costs will exceed **500,000,000** dollars to the entire Airline Industry— should you keep your original proposed deadline requirement date. Mind you, these aren’t just numbers being “taken out of a black hat”. These are real world numbers that require more extensive review. The Airline Association after and extensive thorough research found that the FAA’s estimates (**200,000,000**) and perceived cost (**520,000,000**) to the Airline Community are under estimated and should be investigated further. If the FAA carries out the rule with this time constraint we believe the ultimate consumer, not only the Airline Industry, shall have to bear the cost burden that this brief deadline will pose. There may be price increases on all flights and therefore causing an exodus from the Airline Business to the local transportation industry by land and water. We are not trying to say that no one should bear the weight as this rule we believe exemplifies the FAA’s commitment to safety. However, we ask that this **12-month** deadline be extended to **36-months** to allow the Airline Community to impose your rule and impose it in a cost effective manner.
- The Second is the Daily inspection requirements that the FAA proposes. Understanding the scope and complexity of the unwarranted deaths of those Men, Women, and Children on TWA flight **800** (July 17th 1996) or the **May 11,1990** Incident in the Philippines, one might be motivated to impose such strict standards on Airline Carriers. However, we ask that these intervals be extended to at least 3 days, as most Airline Carriers

have extensive inspection posses they implement on a daily basis. The reasoning for this revision is the cost constraint this section also poses to all of the Airline Personnel involved. It would just be too costly to inspect Planes on a daily basis. Many considerations must be taken. How many flights per plane are initiated on a weekly basis? Does the Airplane have any updated safety equipment such as Aluminum Mesh Technology and/or Fiber Optic wiring integrated into its' fuel system design? What is their current itinerary for inspection **interval**? Taking into consideration all the criteria mentioned above we ask that the FAA further review this Daily Inspection and extend it to a more viable alternative time intervals for these fuel system inspections. On older aircraft (depending on what the FAA considers to be out dated aircraft) however, we ask the FAA to maintain its stance on the Daily inspection interval proposed in the -- docket.

- Third, Smith Industries, having conducted thorough research on fuel system safety, developed a **Transient Suppression Unit** (TSU). Although the price hasn't yet been set, the **Voltage Suppression features** that this new technologically enhanced Fuel tank unit can reduce the probability of the heating of the fuel tank. Therefore reducing the development of flammable vapors. There is also **Fiber Optic** technology that needs to be developed, but is none-the-less a viable alternative to the contemporary parts that have proven to be **obsolete**—this can be exemplified through the deaths of the many involved in these “preventable accidents.” **There is** also an **Aluminum Mesh** technology that has been around for quite some time (It is currently employed to prevent fuel tank explosion by a number of military organizations in Europe and Asia, as well as Civil Law enforcement in various Industries), which ‘reduces evaporative emissions up to **60%**¹. It is has also been

¹ George J. Hochbrueckner & Associates

found that **this Aluminum Mesh** technology reduces combustion over pressure by absorbing the heat from the ignition source and the dispersing it, effectively preventing an explosion.

As members of the “flying Community” we ask the FAA to investigate further the Real **World** impact of this rule. Not **only** viewing it through a financial microscope, but rather a socially responsive and technologically adaptive magnifying glass, we ask that emerging technologies be looked into as Smith Industries has and help encourage this metamorphosis of technology through a cost-effective rule that will not only benefit those financially at stake, but the one’s we love most. We thank you for your time and patience and we only hope for the safest possible skies for the future.

Respectfully yours,

Directors of our Committee

Robert Aldir

Ildefonso Balart

Tessie Delgado

Roger Juarez

Rafael Somarriba

Date: 4/5/00 10:13 AM
Sender: 9-NPRM-CMTS (Agent, Rule)
To: Douglas CTR Gillam-Jr
Priority: Normal
Subject: Proposed rule comment

Dear Sir or Madam,

We ask that you review these comments we offered in reference to
Docket: FAA-1999-6411; Notice No. 99-18

Thank You!

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Prop Rule
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