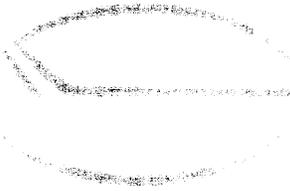


105676



ORIGINAL

Air Transport Association

August 11, 2000  
No. FAA-2000-7471-6

Dockets Management System,  
Department of Transportation Dockets,  
Room Plaza 401,  
400 Seventh Street SW,  
Washington, DC 20590-0001

Subject: Comments to Docket No. FAA-2000-7471 - Fire Protection Requirements  
for Powerplant Installations.

Ladies/Gentlemen;

FAA has proposed a rule that, if adopted, would amend the airworthiness standards for transport category airplanes to establish a new requirement for fire protection of powerplant installations. This proposal would require that components within a designated fire zone must be fireproof if, when exposed to or damaged by fire, they could pose a hazard to the airplane. ATA appreciates the opportunity to comment on this proposed rule.

ATA members generally concur with the proposed airworthiness standards. However, as indicated in one of the attached carrier comments, there are questions regarding the philosophy behind the requirements of the rule and the criteria for determining if containers are fireproof.

Your serious consideration of these comments would be greatly appreciated

Yours sincerely,

Charlie Bautz  
Director, Operational  
Engineering

Attachment

## **Bautz, Charlie**

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**From:** Barfield, Ealy [Ealy.Barfield@Delta-Air.Com]  
**Sent:** Thursday, August 03, 2000 4:56 PM  
**To:** Bautz, Charlie  
**Cc:** Hill, Wally; Sandow, Fred; Carter, Aubrey; Dean, Doug  
**Subject:** ATA Memo 00-AE-054 Powerplant Fire Protection NPRM

Charlie, we have reviewed the subject NPRM and offer the following:

1. We question the need for this rule, since its requirements seem to fall within the current 25.902(c) philosophy of "no single failure, malfunction, or combination of failures will jeopardize the safe operation of the airplane."
2. What criteria will be used to determine whether a flammable fluid-carrying component is fireproof?

Thank you for the opportunity to comment on this proposed rule through ATA.

Ealy Barfield  
Program Manager - Engine AD/Regulatory Compliance  
Delta Air Lines, Dept. 595  
(404) 714-0798, FAX (404) 714-4555  
ealy.barfield@delta-air.com

## Bautz, Charlie

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**From:** Harry Demarest [Harry\_Demarest@amrcorp.com]  
**Sent:** Monday, July 31, 2000 11:50 AM  
**To:** Bautz, Charlie  
**Cc:** Bill\_Detamore@amrcorp.com; Bob\_Iliff@amrcorp.com; Carmine\_Romano@amrcorp.com;  
Gerald\_J\_Chambers@amrcorp.com; Gerry\_Burns@amrcorp.com;  
Jeff\_Jones@amrcorp.com; Mike\_Keller@amrcorp.com; Randy\_Phillips@amrcorp.com;  
Rick\_Yorman@amrcorp.com  
**Subject:** Airworthiness Engineering Memorandum #AE2000-054

Subject: Airworthiness Engineering Memorandum #AE2000-054  
Fire Protection Requirements for Power Plant  
Installations  
- Notice of Proposed Rulemaking

Reference: (1) ATA Memo 00-AE-054, June 14, 2000

This Notice of Proposed Rulemaking (NPRM) recommends adoption of a new requirement for fire protection of power plant installations. The new requirement adds "component level" fireproofing to the existing "zone level" and "installation level" fireproofing considerations within designated fire zones specified in part 25, section 25.1183. The purpose of this rule is to provide harmonization between part 25 and JAR-25 based on ARAC Fast Track recommendations. In this case, the rulemaking will be based on the most stringent of the two standards and will apply to new aircraft type certification.

American Airlines has no objections to the proposed rulemaking. It should help to insure that the components level is not overlooked during aircraft design development and certification, improving safety, and does so without affecting currently accepted industry design practices. We feel this document clearly communicates the FAA's intent and can be understood by the public.

H. A. Demarest  
Managing Director  
Power Plant Engineering

cc: R. Phillips  
J. Jones  
R. Yorman  
M. Keller  
C. Romano  
W. Detamore  
B. Iliff  
G. Chambers



Maintenance Operations

August 8, 2000

Air Transport Association of America  
1301 Pennsylvania Ave., NW, Suite 1100  
Washington, D.C. 20004-1707

Attention: Mr. Charlie Bautz  
Director, Operational Engineering

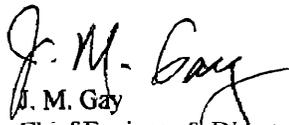
Subject: Fire Protection Requirement for Powerplant Installation; Proposed Rule  
NPRM Docket No. FAA-2000-7471

Reference: ATA Memo 00-AE-054

Dear Mr. Bautz,

The reference ATA Memo advised of and requested comments on the subject proposed rule that will require components within a designated fire zone be fireproof if, when exposed to or damaged by fire, they could pose a hazard to the airplane. Since this FAR amendment is only for regulatory standardization and mandates no actions, we concur with the contents of the proposed rule and have no additional comments.

Sincerely,

  
J. M. Gay  
Chief Engineer & Director,  
Aircraft Engineering

cc: Tom Carothers, United Airlines - SFOEG  
Clay Satterlee, United Airlines - SFOEG  
Jim Takeuchi, United Airlines - SFOEG