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FAA-00-7952-30

28293

OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

18

Date: 5/31/99 5:23 PM
Sender: alex.richman@ns.sympatico.ca
To: 9-NPRM-CMTS
Priority: Normal
Subject: DOCKET 28293

1999 JUN -9 P 4: 47

-- see attachments --

-----Forwarded-----

From: DOTPostmaster at cchub
To: alex.richman@ns.sympatico.ca at Internet
Subject: Delivery-Report (failure)
This report relates to your message:
of 31 May 1999 16:44:35 -0400

Your message was not delivered to:
/c=US/admd=ATTMAIL/prmd=gov+dot/o=FAA/s=9-NPRM-CMT/@usdotmh-gw.dot.gov
for the following reason: Transfer failed

The original message follows:
Reporting-MTA: x400; /c=US/admd=ATTMAIL/prmd=gov+dot/
Arrival-Date:
31 May 1999 16:44:36 -0400
DSN-Gateway: dns; usdotMTA
X400-Conversion-Date: 31 May 1999 16:44:36 -0400

Final-Recipient: rfc822;
/c=US/admd=ATTMAIL/prmd=gov+dot/o=FAA/s=9-NPRM-CMT/@usdotmh-gw.dot.gov,
Action: failure
Status: 5.1.1
Diagnostic-Code: x400; Reason 0 (Transfer failed); Diagnostic
0 (Unrecognized recipient address);
X400-supplementary-Info: "NPRM-Service Difficulty Reports";
X400-Originally-Specified-Recipient-Number: 1

X400-Subject-Intermediate-Trace-Information: by
/c=US/admd=ATTMAIL/prmd=gov+dot/; Relayed; 31 May 1999 16:44:35 -0400
X400-Content-Type: P2-1988 (22)
X400-Original-Encoded-Information-Types: IA5-Text, (2)(6)(1)(4)(12),
(2)(16)(840)(1)(113694)(2)(2)(1)(3);



unnamed1



ATTACH01

009719 1119:13

Message-Id: <375364E5.9449573C@ns.sympatico.ca>
Incomplete-Copy: TRUE
From: Alex Richman <alex.richman@ns.sympatico.ca>
To: /c=US/admd=ATTMAIL/prmd=gov+dot/o=FAA/s=9-NPRM-CMT/@usdotmh-gw.dot.gov
Subject: NPRM-Service Difficulty Reports
Return-Path: <alex.richman@ns.sympatico.ca>
X-Mailer: Mozilla 4.04 [en] (Win95; I)
MIME-Version: 1.0
Content-Type: multipart/mixed; boundary="PART.BOUNDARY.usdotmh.2986.3752f4b4.0001"

--PART.BOUNDARY.usdotmh.2986.3752f4b4.0001
Content-Type: text/plain; charset=us-ascii
Content-Disposition: inline

Comments on Docket No. 28293

--PART.BOUNDARY.usdotmh.2986.3752f4b4.0001
Content-Type: text/plain; charset=iso-8859-1
Content-Transfer-Encoding: quoted-printable
Content-Disposition: attachment; filename="Nprm3.txt"
Content-Description: Nprm3.txt
FTBP-Object-Size: 4901

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28 May 1999

Federal Aviation Administration
Office of the Chief Counsel
Attn. Rules Docket (AGC-200)
Docket No. 28293
Room 915G
800 depenmdnce Avenue SW
Washington DC 20591

9-NPRM-CMTS@faa.dot.gov

Dear Chief Counsel:

Docket No. 28293- SDRÆs

I am commenting on the NPRMS- Service Difficulty Reports

I devote over half my time to collating Service Difficulty Reports into a longitudinal

history for an individual aircraft and analyzing these data. This NPRMS makes major

improvements in the Report.

Two problems remain:

1) Aircraft total time and total cycles are essential for each report. These data help monitor malfunctions associated with time and cycles. Without

these data we are restricted to assessing only the age of the aircraft.

2) Station and flight numbers should be required. The flight number and the flight

segment (source and destination) are very useful in giving an overview of possible

airport differentials in maintenance. Identifying these trends could help to catch

repeated problems occurring more frequently at one station.

We strongly support the following changes:

1) Use of the term "Service difficulty reports".

2) Airworthiness Directives and Service Bulletins

2.1. the FAA should continue to receive SDR's for a particular problem after an AD

has been issued and incorporated.

2.2. The aging aircraft information should continue to be reported on SDR/Æs.

3). The existing data base will remain available for research and use by industry, and

future information collected, as proposed, would be added to the existing data base.

4) FAA Form 337 and the SDR do not constitute a duplicate reporting requirement.

5) Requiring SDR/Æs for "any false warning of fire or smoke."

6) Clarifying the requirement that failures, malfunctions, or defects occur

curing during

ground operations must be reported.

7) Reporting of an engine flameout or shutdown during ground or flight operations if it

is the result of a failure, malfunction, or defect.

8) Reporting of fuel dumping regardless of whether it occurs during ground or flight

operations.

9) All failures, malfunctions, or defects associated with landing gear extension or

retraction during flight be reported.

10) Brake system component that results in any detectable loss of brake actuating

force when the aircraft is in motion on the ground. Such information, regardless of

deferability in accordance with the MEL, should be reported.

11) Rejected takeoffs (RTO's) after initiation of the takeoff roll or emergency actions

during flight.

12) Reporting of all failures, malfunctions, or defects of an emergency evacuation

system or component including those deferred in accordance with a MEL.

13) Reports for failures, malfunctions, or defects of autothrottle, auto flight, or

flight control systems or components found to be defective or that fail to perform their

intended function.

14) Each certificate holder shall report any failure, malfunction, or defect in an aircraft

system, component, or powerplant that occurs or is detected at any time if that failure,

malfunction, or defect has endangered or may endanger the safe operation of an

aircraft. The phrase "in its opinion" would no longer be included in the rule language.

15) The FAA will use inspector guidance to emphasize that inspectors should use

available computer systems to review SDR data.

16) A 96-hour requirement for the submission of reports

17) A report must be submitted electronically or in another form acceptable to the

Administrator. One year after the effective date of the rule, part 121 certificate holders

would be required to submit reports in an electronic form.

18) Submission of the manufacturer, the model, and the serial number of the aircraft,

engine, or propeller.

19) Requirement that an SDR include the operator designator rather than the name of

the operator.

20) Use of the applicable JASC Code.

21) The proposed rule language should be clarified by substituting the phrase

"precautionary or emergency action taken" for "emergency procedure effected."

22) Requirement that an SDR include a unique control number

23) Information such as corrosion classification and crack length be reported.

24) Require reports following each interruption to a flight for any aircraft,

Sincerely,

Alex Richman MD MPH

President

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