

110662

OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

8

Date: 5/27/99 4:07 PM
Sender: jkohlbr@twa.com
To: 9-NPRM-CMTS
Priority: Normal
Subject: SNPRM SERVICE DIFFICULTY REPORTS

1999 JUN -9 P 4:47

To: 9-NPRM-CMTS@FAA.DOT.GOV
cc: GGIBSON --VMIDS GARD G. GIBSON

FAA 2000-7952-28

From: JERRY KOHLBRECHER MCIGDTW Trans World Airlines
MANAGER, FAA/ATA LIAISON, 1-465 MCI, (816) 891-4970
SUBJECT: SNPRM SERVICE DIFFICULTY REPORTS
Ref: Docket No. 28293

Trans World Airlines (TWA) is greatly concerned about the significant additional Service Difficulty Reports (SDR) that would be required by the adoption of this NPRM.

The all-encompassing wording "autothrottle, autoflight, or flight control systems or components of these systems," would require a SDR report for nearly every aircraft logbook entry involving ATA 22 or 27. Including all ground incidents and ALL engine shutdowns further substantially increases the number of reports.

Our estimate is that required submissions could easily double, a 100 per cent increase.

The FAA estimated cost of \$15 per year is totally unrealistic. Each reportable event must be written up by maintenance personnel, then transmitted by teletype to the central office that processes the reports. Maintenance personnel will submit many more reports than are needed, especially on ATA 22 and 27 items, to be sure that none are missed. The man-hours diverted from aircraft maintenance to report writing will be significant.

Hours/cycles and other required inputs must be accumulated, and draft reports written, proofread, and corrected. The \$15 estimate would probably not cover the extra paper used. Several thousand dollars would be more realistic.

Jerry Kohlbrecher

00 SEP 19 PM 12:12
DEPT OF TRANSPORTATION