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OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

1999 JUN -9 P 4: 47

Dear Sir,

Please find listed below Comments on FAA SNPRM Docket no. 28293,
Notice No. 95-12A

The objective of this NPRM, to update and improve the reporting system to effectively collect and disseminate clear and concise safety information to the aviation industry, is of considerable interest and is strongly supported by BAeRA. Any changes which can increase the effectiveness of the reporting system and improve the quality of the data being reported can only help benefit the monitoring and management of aircraft safety across the industry.

The clear definitions contained within the NPRM of those safety related events that operators and repair stations are required to report should improve the accuracy and consistency of reporting. It is also important that the reporting criteria be kept suitably broad in order to capture those events which on their own may appear innocuous, but which as a trend may have a safety related impact.

The continued airworthiness responsibilities of BAeRA, as an aircraft manufacturer, require the monitoring of all safety related events occurring to operators of our aircraft types, and the assessment of the extent of any impact on the rest of the world fleets. The effective achievement of this is dependent upon not only the detail of the SDR reporting but also the timeliness with which the information is made available.

It is our experience that airlines who are required to provide FAA SDR reporting rarely also provide safety event information direct to BAeRA, either in parallel or in addition to the required FAA SDR reporting. The aircraft manufacturer must therefore depend upon finding out about these clear or potential safety issues through the output from the FAA SDR reporting system.

It is considered that it would be of benefit, both in terms of timeliness and ensuring that any safety event is considered in the context of all aircraft of that type, if the airlines were required to inform or provide copies of all SDRs direct to the aircraft manufacturer in parallel with their submission to the FAA.

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