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Air Transport Association

OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

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May 28, 1999

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Federal Aviation Administration (FAA)
Office of the Chief General Counsel, AGC-200
Attention: Rules Docket No. 28293
Room 915G
800 Independence Avenue
Washington, DC 20591

FAA-2000-7952-22

Subject: Supplemental Notice of Proposed Rulemaking, Service Difficulty Reports, 64
Federal Register, 18766, April 15, 1999

Ladies/Gentlemen:

FAA has issued a Supplemental Notice of Proposed Rulemaking, which, if adopted, would mandate specific reporting requirements for air carrier certificate holders and certificated domestic and foreign repair stations concerning failures, malfunctions, and defects of aircraft, aircraft engines, systems, and components. The objective of the proposal is to update and improve the reporting system to effectively collect and disseminate clear and concise safety information to the aviation industry.

The Air Transport Association opposes the proposal as written. Specifically, in its current form, the Service Difficulty Reporting (SDR) system should be examined to determine the value of the data. The expansion of the existing rule, as illustrated in the proposal, provides no benefit for the enhancement of safety. It is considered that the volume of additional data will not necessarily identify particular problems.

FAR 121.703 (e) (7) would require future reports to include the Joint Aircraft System/Component Code (JSAC) rather than existing ATA codes. The ATA codes, of course, are the cornerstone and industry standard for technical data development as well as reporting. Further, this coding process has been in practice within the aviation industry for more than forty years. FAA's suggestion that the JSAC code is consistent with the ATA code is unfounded. If carriers were required to adjust their existing systems to accommodate this requirement, each operator would be required to convert its computer records to reflect the change at a substantial cost. One carrier indicates that computer re-programming costs would exceed \$500,000. In addition, the proposal would force carriers to conduct significant training to familiarize staff with the proposed coding. This requirement may well cost up to \$840,000 per airline to provide adequate training.

The expanded structural reporting requirements contained in the proposed FAR 121.704

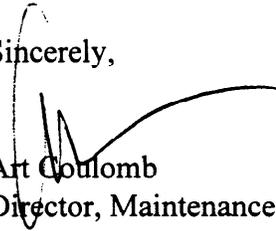
will not provide the FAA with valuable "safety" information. On the contrary, many reports will be filed as open reports as specific repair information can not be made available until such time that the repair process is completed. Adjusting the process from filing the time the aircraft returns to service to 96 hours from the time of discovery places an additional burden on the airlines with questionable benefit. In addition, it would appear that this requirement would be a redundant effort as the airlines are required to submit structural repair data mandated by Airworthiness Directives. Further, the effort is duplicated by airline reliability programs, which, of course, are monitored by FAA.

The estimated cost to incorporate the provisions of this proposal is significantly under forecasted costs identified by the airlines. Taking into consideration the laundry list of requirements, which will be borne by the operators, it is estimated that the proposal would cost individual airlines more than \$1.7M. This estimate is based upon line items including staff training, computer re-programming costs, additional resources, and computer hardware.

Attached for your review are the comments submitted by five airlines. The comments identify additional issues for review by FAA. . Additional airline comments will be submitted to the FAA immediately upon receipt.

Thank you for your consideration of these views.

Sincerely,



Art Coulomb
Director, Maintenance & Materiel

Attachment

Cc: Maintenance Operations Committee
Airworthiness Engineering Committee
Reference: 99-MO-027



May 28, 1999

Mr. Art Coulomb
Director, Maintenance & Material
Air Transport Association
1301 Pennsylvania Ave., NW
Suite 1100
Washington, DC 20004-1707

Subject: Service Difficulty Reports, Response to Supplemental Notice of Proposed Rule

Reference: MO Memo 99-027

Dear Mr. Coulomb:

The following brief comments are provided in response to the SNPRM on behalf of Airborne Express:

As was the general consensus of the M.O.C. at the meeting this week, Airborne can see very little benefit to the provisions as outlined in the proposal.

As a general comment, the six weeks allowed was very short considering the complexity of the proposal, the 3 1/2 years since it has been on the table, the very little understanding of the impact acknowledged by the FAA, and additional questions raised from reading comments submitted back in 1995. It was fortunate that we had a meeting this week with other ATA member airlines where we could openly discuss this SNPRM.

There are a few provisions that are beneficial and in some cases already being done. But the positive represents less than 10% of the proposal.

- ⇒ Electronic submission has been in effect for years at ABX. This format by-passes our PMI as is suggested in the SNPRM.
- ⇒ The numbering of SDR's is also in place and has been for years as well.
- ⇒ Elimination of dual reporting by both 145 repair stations and the operator is in effect as ABX does all the reporting for our aircraft.

⇒ Changing the titles to SDR (operational) and SDR (structural) can eliminate some confusion.

on the negative side:

It has been noted at ABX and confirmed by attendees at this week's meeting that the existing data base serves little benefit. If any analysis is done, it is transparent to the operators. Adding additional reporting requirements will only add more information to an already ineffective data base.

The NPRM acknowledges that the increase in volume of SDR's is not known but is assumed to be 1% each year. Based on estimates by our Reliability Department, the volume could be expected to increase substantially, possibly more than double what we do today. This opinion seemed to be confirmed across the board by other carriers at the meeting.

It is highly questionable how the FAA will be able to handle and manage this increased volume of data. Costs will certainly go up on the part of the FAA as well as operators.

The issue of the JASC coding verses ATA coding seems to have questionable benefit. American Airlines would appear to be correct in identifying an issue with training and confusion related to the use of two systems.

The requirement to identify part number, manufacturer, part name and location in addition to follow up and reporting of shop findings would also add undue burden to operators. There are many parts that fall into material classifications that are not closely controlled. Multiple interchangeable part numbers, or multiple manufacturers may be in use. There is no clear detailed control of these parts which would now be required. This requirement would add cost to the operators in the form of material handling, tagging, record keeping, paperwork and follow up with vendors.

On the question of discrepancies addressed by the MEL, the objective of the program is to monitor events that have or may endanger the safe operation of the aircraft. The fact that the MEL permits operation with the defect would validate that safe operation is not in question.

Reporting of discrepancies within 96 hours of discovery, even for those aircraft in heavy check places additional burden on the operator and repair stations with questionable benefit. The follow-up required after the initial submission of the defect is an inefficient approach. While there is some validity to the argument that some aircraft may remain in a heavy check for an unusually long time, this is the exception versus the rule. Operators are generally motivated to keep their assets productive. In those exceptional cases, little benefit can be expected as the great majority of reports would still be quite timely allowing submission after the check is complete as opposed to while it is in progress.

There needs to be consideration given to exceptions for events that occur during the course of maintenance. An aircraft going through a maintenance visit may have a defective bracket on the rear spar. Through the course of replacing the bracket, a fastener may develop a fuel leak. The leak, being in a confined space could be considered hazardous. However, the defect was introduced through the course of maintenance. It was not the result of operational influences. Due to the potential for maintenance to introduce defects as systems are disturbed, there needs to be consideration given to exclusion of these events during maintenance.

It would appear that this proposal is a redundant effort duplicated by the Reliability Programs in effect and monitored by the FAA. A great deal of visibility, analysis, review and action takes place at each operator through their Reliability Program. To feed additional information to the FAA data base for questionable benefit is a poor use of resources.

Sincerely,

Mike Sharbaugh
Sr. Director, Quality Control

MS:jac

MS0528

AIR CANADA



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May 27, 1999

Mr. Art Coulomb
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Air Transport Association of America
1301 Pennsylvania Ave., N.W.
Suite 1100
Washington, D.C. 2004-1707
U.S.A.

Via fax – (202) 626-4081

Subject: Docket No. 28293; Notice No. 95-12A - Service Difficulty Reports

Dear Mr. Coulomb:

Although a Canadian company, Air Canada feels compelled to join with the rest of the ATA member airlines in commenting on the subject rulemaking proposal. As many of our third party maintenance customers operate under Part 121 certificates, we believe the objective of this rule will affect our operations as a repair agency under the 14 CFR43.17 privileges extended to Canadian Approved Maintenance Organizations. I cannot help but believe we will be required to provide reporting on behalf of our customers.

To begin with, Air Canada agrees with all of the issues raised in the 14 May, 1998 American Airlines letter from R. W. Jackson dealing with this NPRM, save one. We would not object to the electronic submission if provided with the appropriate software.

Our primary concern with this proposal rests with the fact that we have seen no demonstrated increase in safety as a result of mandatory reporting. Though we have been routinely filing reports vis the Canadian SDR program, which we understand is linked to the FAA database, we have yet to see any real benefits to offset the costs imposed by data collection.

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AIR CANADA



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It was our understanding that the basis for collecting this data was to provide a database that would substantiate the effectiveness of manufacturer developed bulletins and repairs. In one example, such as the new section 121.704 proposals, we fail to see the safety enhancement that will result, given the current degree of reporting under existing Corrosion Control Programs that must already be made directly to the manufacturers, and in extreme cases, the regulator. This new section is worded in such general terms that many non-routine work cards generated during heavy checks will now constitute reportable SDRs. Although tracked internally as part of our Maintenance Reliability & Development Programs, forcing us to report via a separate activity will consume significant manpower which does not exist today. I believe that the FAA has grossly underestimated this increased cost to the airlines, especially given that the NPRM presumes only a 1% increase in the reporting level.

This is but one example of an area which requires more study, and perhaps accurate costing, which cannot be developed under this shortened comment period. I remind you that these expanded reporting requirements have come about at a time when we have yet to see a demonstrated enhancement to safety. This causes us to question not only these reporting enhancements, but the goal of the program itself. Our preference would therefore be that this rulemaking initiative not go forward, or at the very least, that we be given further opportunity to comment beforehand.

Sincerely,

for -

Bernie Adamache
 Director, Maintenance Quality and Technical Training

American Airlines[®]

MAINTENANCE & ENGINEERING CENTER

May 14, 1999

Mr. Art Coulomb
Director, Maintenance & Material
Air Transport Association
1301 Pennsylvania Ave., NW
Suite 1100
Washington, DC 20004-1707

Subject: Service Difficulty Reports, Response to Supplemental Notice of Proposed Rule

Reference: MO Memo 99-027

Mr. Coulomb:

The following comments are provided in response to the subject draft NPRM:

Electronic Transmission

The new requirement, FAR 121.703(e), mandates that a part 121 certificate holder shall submit the SDR reports required by this section in an electronic form acceptable to the Administrator is unreasonable and burdensome. This proposal is prejudiced against part 121 certificate holders, because part 125, 135, and 145 certificate holders will have the option to submit in electronic or paper form. It clearly does not take into account that part 121 certificate holders have invested a large amount of time and resources in their present system. Additionally, the 121 certificate holder's systems are used internally for tracking, trending and reliability. Mandating that part 121 certificate holders use the FAA's software and submit SDRs electronically will force the carriers to replace their present system or accomplish duplicate data entry, resulting in unnecessary additional costs.

In a large part 121 certificate operation such as American Airlines, the reporting of SDRs is a complex process. We monitor and receive SDR reports from over 150 line stations and two (2) main maintenance bases. Presently at American Airlines, the two (2) main maintenance bases that report occurrences requiring SDRs do so on a form that is used for purposes other than just reporting SDRs to the Administrator. One copy is used to record work performed during a maintenance check and subsequently archived in the Bill-of-Work package. Another copy is forwarded to Engineering for their review and consideration. Revamping the present reporting system, training numerous employees in a new unneeded process, and changing the culture in our company will cause a tremendous burden on American Airlines.

The FAA assumes that all part 121 certificate holders are using IBM compatible computers. American Airlines is presently using Macintosh computers to submit SDRs to the Administrator. To mandate that a part 121 certificate holder must use an IBM compatible computer is as ludicrous as a part 121 carrier requesting that the FAA purchase and use a Macintosh computer so the FAA can be compatible with the part 121 certificate holder. For American Airlines to continue to process SDRs in the same manner as it does today there will be an additional outlay of approximately 10,000 dollars for new hardware and 260 dollars per month charge for a service maintenance agreement on equipment.

Mr. Art Coulomb
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American has always been a proponent of automation, but it should be a carrier's option to submit their SDRs electronically or in paper form. Mandating electronic transmission of SDRs for the part 121 certificate holders without an option is unacceptable.

JASC Coding

FAR 121.703 (e) (7) would require SDR reports to include the Joint Aircraft System/Component Code instead of the ATA code that is presently being used. In the preamble of the subject NPRM, it states that "The current ATA Code system basically is consistent with the JASC Code system; therefore, users of the ATA Code should not need to significantly revise their procedures to adopt the JASC Code." We disagree, to change to a different code will require training all individuals involved in the reporting of SDRs. We perceive that changing to the JASC Code could cost as much as 840,000 dollars in training costs and 500,000 in reprogramming costs. Since, ATA codes are the universally accepted coding method within the industry. We are against using the JASC codes.

Value of Data

We should examine the SDR system to see if there is any reason to continue submitting SDRs. Reporting SDRs is a very time consuming, labor intensive exercise and may have little or no value. American Airlines is not confident that the increase in data will result in any gain in safety. The volume is so large that no particular problem will be revealed because of the large quantity of data that needs to be evaluated. We suggest that the cost-benefit of the SDR program be reviewed.

Cost Impact

The FAA states that there will be few new SDR reporting requirements and the impact will be minimal. We disagree. The proposed rule dramatically expands the types of reportable incidents and American Airlines expects a significant increase in the number of reportable SDRs. American reported nearly 2,600 SDRs in 1998. With the expansion of reportable items, this number could increase to over 5,000 SDRs. The cost of this increase will be significant to American in the form of increased staffing requirements. The additional cost to American Airlines in reporting these additional SDRs will be approximately 378,000 dollars annually.

American will be financially burdened by the mandated electronic filing rule. Presently, American submits the SDRs to the FAA on a form that is used to support additional maintenance needs. If electronic reporting is mandated, it will cause American to change the way that data is gathered, input and submitted. This change will have a significant cost impact on American as we create a new form, approximately 50,000 dollars, exclusive to the SDR program and purchase new computers that are IBM compatible with the FAA software. A more reasonable rule would be to allow optional electronic reporting to the FAA.

The NPRM is moving the reporting burden from the FAA Certificate Management Office (CMO) to the industry. Currently, the FAA CMO has the responsibility to review the data and report it to the central FAA office. By removing them from the process, their contributions to the process will now fall on the carriers. American is not opposed to centralization in an effort to simplify

reporting. However, the costs associated with removing the FAA will be borne by the carriers. The NPRM should address the impact of removing the FAA from the reporting chain.

There are many undefined costs that were not discussed in this NPRM. The NPRM states that the cost to the part 121 certificate holders will only increase by fifteen dollars a year. Fifteen dollars is spent in producing just one (1) or two (2) SDRs today. The proposed cost impact to the certificate holders is not accurate or reasonable. Many internal costs to the air carriers such as training, procedural and administrative systems will need to be revamped, overhauled, and created. The proposal only addresses the benefits to the FAA. Additionally, the FAA assumes the software they provide will replace the air carriers established system that has been acceptable to the Administrator for many years.

Structural SDRs

The FAA seeks to mandate the reporting of SDRs within 96 hours from the time of discovery for aircraft undergoing heavy check. The industry practice is to report the SDR within the required time after the aircraft has been returned to service. This change in policy will have a significant impact on American. SDRs associated with heavy maintenance are typically structural reporting requirements. The expanded reporting requirements in the proposed FAR 121.704 will cause a significant increase in the number of SDRs. This increase, coupled with the requirement to report the items within 96 hours from the time of discovery, will force American to change the way we report the SDRs. Structural items that require reporting usually take several days to work and repair. The data required for an SDR report will not be available until the repair process is completed. Currently, our SDRs generated from heavy maintenance check are consolidated and sent to a central department for reporting to the FAA. By forcing air carriers to report structural type reports 96 hours from the time of discovery, instead of from the time the aircraft returns to service, will cause additional and unnecessary administrative burden. It will result in more open reports being filed because all of the repair data is not available. American Airlines anticipates that this requirement will require two (2) additional analyst also needing new computers. This would cause American Airlines to incur an additional cost of 213,000 dollars per year.

The value of the expanded structural reporting requirement must be questioned. The industry already gathers and reports structural repair data that is mandated by Airworthiness Directives. Reporting this information under the SDR program seems to be a duplication of effort. This duplication is not addressed in the NPRM and should be considered by the FAA before any final rule is put into effect.

Expansion of Reportable Items

The new requirement in FAR section 121.703(a)(5) regarding reporting engine shutdowns during ground or flight operations (unless intentional) will cause confusion. Most shutdowns in flight are pilot initiated and tend to be precautionary in nature. Except for flameouts, seized engines, and ER operations, engine shutdowns as such do not presently warrant special reporting through the SDR system.

The new requirement of reporting flameouts during ground operations will also cause enforcement problems with inspectors who have excessively stringent interpretations of the rules. If ground

operations flameouts are to be reported, this should be confined to events occurring after initiation of takeoff roll.

We take exception to the new requirement in FAR section 121.703(a)(7) regarding reporting fuel leakage on the ground. As currently worded, the new requirement would include reporting of fuel leaks during heavy maintenance when leaks accrue after assembly. Additionally, fuel spills caused by fuelers overfilling tanks would now become reportable.

We believe by expanding the language to include ground operations, an additional burden is being imposed on certificate holders that is unnecessary. The new requirement will also cause passenger inconvenience when inspectors delay or cause cancellations over the interpretation of the rule. The new requirements in FAR section 121.703(a)(12) regarding reporting failures, malfunctions, or defects of autothrottle, autoflight, or flight control systems are redundant and already reportable under Section 121.703(c). The lack of data pertaining to unexplained airplane rolls is a reporting issue with the air carriers that fail to report those malfunctions. Creating additional categories under 121.702(a), is not addressing the compliance issue of those carries that fail to comply with the FAR.

The proposed rule in FAR section 121.703(a)(11) requiring all failures, malfunctions, or defects of an emergency evacuation system or component has no added merit. The number of reportable items involving emergency system components such as battery packs, lamps, and light strips would increase significantly. These high maintenance components do not render the system inoperable or add information to the SDR data base that is safety related.

The new requirement in section FAR 121.703(a)(10) of reporting rejected takeoffs (RTOs) is already reportable under FAR section 121.703(c). Creating additional categories under FAR 121.702(a), is not addressing the compliance issue by the air carrier's FSDO.

Expansion of Reportable Data

We strongly disagree with the new requirement in FAR section 121.703(e) of reporting time and cycles of the affected component. This only adds additional administrative workload for the certificate holders and their vendors to supply this data. The number of supplemental reports will increase substantially due to the 96 hour reporting requirement and the associated research time.

If this change goes into effect, we would request the reporting time be increased to ten (10) business days to allow for additional research time.

Cost Summary

American Airlines believes that metamorphosing the existing requirements in reporting of SDRs will be a tremendous and inequitable burden laden on the certificate holders. At American Airlines this unessential expenditure is projected to be 1,994,000 dollars in the first year of mandated electronic transmission of SDRs, increased scope of items to be reported, and the constraints of filling structural SDRs.

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This expenditure would include the following:

- 10,000 dollars for new computer hardware
- 260 dollars per month for service maintenance agreement on equipment to continue to process SDRs in the same manner as it does today
- 840,000 dollars in training costs
- 500,000 in reprogramming costs to convert over to using the JASC Code exclusively
- 378,000 dollars in additional cost for the increased reporting requirements
- 50,000 dollars to develop a new computerized form to meet the requirements of the new reporting requirements
- 213,000 dollars for the stringent requirements of reporting structural SDRs.

Obviously this cost to American Airlines is extremely out of proportion to the suggestion in the NPRM that the cost would be only 15 dollars a year for a certificate holder. Although, American Airlines has some unique circumstances, we believe that all part 121 certificate holders will be significantly subjected to an unrealistic financial burden if this NPRM becomes a final rule. In closing, American Airlines must repeat that we are adamantly opposed to this NPRM becoming a final rule.

Sincerely,



Robert W. Jackson
Managing Director
Quality Assurance

RWJ:MJK



P. O. Box 20706
Atlanta, GA 30320-6001

May 28, 1999

E-MAIL AND STANDARD MAIL

Mr. Art Coulomb
Director - Maintenance & Materiel
Air Transport Association
1301 Pennsylvania Ave., N.W., Suite 1100
Washington, D.C. 20004-1707

SUBJECT: SERVICE DIFFICULTY REPORTS - SUPPLEMENTAL NPRM DOCKET NO. 28293

REFERENCE: ATA Memo 99-MO-027

We have reviewed the draft SNPRM and offer the following comments:

- The proposed rule should include Public Aircraft. Large transport type aircraft are classified as "Public" and have the same types of problems. The same safety data could be gathered from these aircraft.
- We disagree with the use of JASC Codes instead of ATA codes. The cost of implementing a new coding system would be significant, impacting multiple automation and paper based systems already in place at Delta and most other major air carriers.
- §§121.703(a)(8) as proposed, and taken literally, would require several SDRs to be submitted for every routine flight. We suggest using the word "uncommanded."
- Reference §§121.703(a)(12): we know of no data to suggest a link between autothrottle/autoflight systems and uncommanded control inputs.
- §§121.703(c) currently contains the phrase "in its opinion." The NPRM proposes to delete the phrase. It should not be deleted. Deletion would remove any flexibility in reporting and increase enforcement problems with inspectors who have various interpretations of the rule.
- We disagree with the requirements in §§121.703(e) to report manufacturer name, time, and cycles of components. Manufacturers do not use duplicate part numbers, so manufacturers' names should not be required. These requirements add significant administrative workload for operators and vendors and will greatly increase supplemental reporting.
- Currently, §§121.703(e) recognizes the reporting burden placed on the operators and allows reports to be submitted in a form compatible with the operator's communication systems. The proposed rule places the full burden (logistics, economics, programming, etc.) on the operators to conform to the Administrator's electronic format and its future revisions. In time, the costs of reporting alone will far outweigh any benefits from SDR reporting.

Mr. Art Coulomb
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- Reference §§121.704(a): we are against reporting repairs which are not in the OEM manuals, unless those repairs were major repairs to primary structure or a PSE. Repairs within allowable damage limits, or minor repairs should not require reporting. Also, removing “PS” or “PSE” from the criteria for reporting defects will potentially include secondary structure, resulting in a tremendous increase in the number of reportable items. Although interpretations may vary, the rule must be written to clearly define which structural members require reporting.
- Reference §§121.704(a): we are against reporting repairs which are in the OEM manuals, or for which OEM service data has already been released, or for which an Airworthiness Directive has been released. Once a recurring problem has been addressed, repetitive reporting of the same defect adds no value, unless the defect has recurred following incorporation of the recommended terminating action or repair.
- Reference §§121.705: we are against reporting unscheduled engine removals. Also, this part of the rule should allow for reporting by other means acceptable to the Administrator. We currently provide continuous electronic access to Mechanical Interruption summary data and, therefore, should not be required to comply with a monthly reporting requirement.

We question the practical utility of the current information collection requirements for SDRs. The current reporting requirements are applied inconsistently throughout the industry, resulting in skewed information being available for analysis, potentially invalidating most resultant benefits. We believe the proposed rule will further complicate an already unmanageable reporting system of questionable value. Further, it is obvious that all the man-hour and cost estimates are grossly underestimated. We believe a proper assessment, with input from the industry, would demonstrate that the cost of implementation would greatly outweigh the benefits. Delta Air Lines is adamantly opposed to the adoption of this proposed rule.

If you have any questions, or require more information, please contact Ealy Barfield, Program Manager - Engine AD/Regulatory Compliance, at (404) 714-0798.

Sincerely,

Original Signed By

J. Scott Turco
Director - Compliance & Quality Assurance



SOUTHWEST AIRLINES

MAINTENANCE OPERATIONS CENTER
2832 Shorecrest Drive DAL/2MX
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F A X C O V E R S H E E T

DATE: 5-27-99

TO: Mr Art Coulomb

PHONE: _____

FAX: 202-626-4081

FROM: Mats Sabel

PHONE: (214) 792-5858

FAX: (214) 792-5944

RE: Southwest Airlines Comments on NPRM for SDR Reporting

Number of pages including cover sheet: 3

Message



SOUTHWEST AIRLINES CO.

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May 27, 1999

SWA 9905:331

Mr. Art Coulomb
Director, Maintenance & Material
Air Transport Association
1301 Pennsylvania Ave., NW
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Washington, D.C. 20004-1707

Subject: Service Difficulty Reports, Response to Supplemental Notice of Proposed Rule

Dear Mr. Coulomb:

Southwest Airlines has reviewed the proposed Service Difficulty Report (SDR) Notice of Proposed Rule Making (NPRM) and offers the following comments:

Electronic Transmission

Electronic Transmission is currently being used at SWA for reporting SDR's. Southwest Airlines was one of the first to implement and use the program when the FAA offered it. This will have no impact on SWA.

JASC Coding

The Joint Aircraft System/Component Code (JASC) is unacceptable. This would require reprogramming all computers and extensive training to adapt to this system. We are against this change. This will have a great impact on SWA.

Structural SDRs

The Structural Item reporting proposed for heavy maintenance is totally unacceptable. This will require reporting SDR's which are still in-work, leaving the report open because all repair data are not available. Having to resubmit open SDR's will impose an additional administration burden on both SWA and the FAA. The Structural Item for heavy check reporting should be left as is.

Expansion of Reportable Items

The expansion of reportable items FAR 121.703(e) includes fuel and fuel dumping systems that could cause hazardous leakage will include fuel leakage during installation of components, static leaks, and fuel spills during the fueling of aircraft. This is unacceptable because a misinterpretation of this rule will cause enforcement problems with certain inspectors.

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The Evacuation System changes added to FAR 121.703 (a)(11) included all exit door defects, malfunctions, or failures. Additionally, this includes door trim, window shade panels, and other cosmetic and or secondary structure on doors. This is also unacceptable and not good for SWA due to the high frequency flights and high passenger loads.

Flight Control changes FAR 121.703 (a)(13) could increase SDR reporting by as much as 100%. This includes the reporting of flight control seals, pulleys, cables, brackets, hardware, chafing, rubbing, rigging, etc. SWA finds this unacceptable.

The Expansion of Reportable Data FAR 121.703(e) to include reporting time and cycles of affected components, will impose additional time and manpower requirements due to some information that will have to be collected from vendors and is unacceptable to SWA.

In closing, Southwest Airlines feels that the NPRM will not enhance safety or improve the aviation industry the way it is currently written. Most of these proposals will be very labor intensive and time consuming and there is no real benefit to Southwest Airlines or the airline industry.

Sincerely,



Mats Sabel
Director of Quality

cc: Jim Winberly
Al Davis
Jim Sokol
Chuck Martin