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AIR LINE PILOTS ASSOCIATION

DEPT. OF TRANSPORTATION

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November 13, 1995

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Office of the Chief Counsel, AGC-200
Federal Aviation Administration
800 Independence Avenue SW.
Washington, DC 20591

Re: Docket No. 28293, Notice No. 95-12; Operational and Structural Difficulty Reports; Proposed Rule

Ladies and Gentlemen:

The Air Line Pilots Association (ALPA), representing the safety interests of 43,000 professional airline pilots flying for 35 airlines, has reviewed and supports the basic intent of the referenced notice of proposed rulemaking that would revise the 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 proposed rule would clarify and standardize the type of information submitted to the Federal Aviation Administration (FAA) for input into the Service Difficulty Reporting Subsystem (SDRS) allowing the FAA to identify trends that may affect aviation safety.

Types of Reports

ALPA finds the following proposed changes significant to increasing the "margin of safety" in the air transportation system and thus should not be weakened or removed from the final rule:

1. Revision of the current reporting requirements for air carriers to include the reporting of certain occurrences or detection's of failures, malfunctions, or defects of aircraft, aircraft engines, systems, and components that occur during ground operations (as well as during flight) and could affect the safety of flight operations. We maintain that at a minimum all of the items listed in this proposal which involve significant incidents or occurrences must be reported. This will provide for a larger data base of information from which better trend monitoring information can be derived.



2. Revising the reporting procedures to encourage the electronic transmission of data directly to a centralized collection point as specified by the FAA. (presently, the data base is maintained at the Mike Monroney Aeronautical Center.)
3. Require collecting information on aborted or "rejected" takeoffs caused by the failure, malfunction, or defect of an aircraft component or system. This information would be used to generate statistical data for future analysis of the safety implications such events may have on flight operations.
4. Allowing Part 121, 125, 127, or 135 certificate holders to require a certificated domestic or foreign repair station to submit operational and structural difficulty reports to the FAA on behalf of the certificate holder when the repair station discovers defects or unairworthy conditions.
5. Establishing an optional program that enters SDR data electronically into the SDRS that would provide a database that is near real-time.

We also feel that additional language requiring the reporting of the areas and items list below will further increase the "margin of safety" and thus should be incorporated to strengthen and solidify the final rule:

1. RTOs (Rejected Take Off); "Any failure of an aircraft system or component that provides a precautionary or false indication, i.e., if the RTO was made for an engine fire warning notification but the fire warning system itself failed rather than experiencing an actual engine fire."
2. Anti/De-icing Systems; "Any failure of a component, bleed air source, valve or engine that would or could result in total loss of airframe, engine or propeller anti-icing capability, or would cause an asymmetric lifting condition, or would cause the operator (pilot) to change landing procedures or configuration as a result of this failure."

We understand this proposal is prompted by an internal FAA review of the effectiveness of the reporting system and by air carrier industry (Parts §121, §125, §135, & §145) concern over the quality of the data being reported by air carriers. The purpose of the proposed regulation would be to enhance air carrier safety by collecting additional and more timely data that identifies mechanical failures, malfunctions, and defects which may be a serious hazard to the operation of an aircraft. The information collected would be used to develop and implement corrective actions to help prevent future occurrences of these failures, malfunctions, and defects once they have been identified.

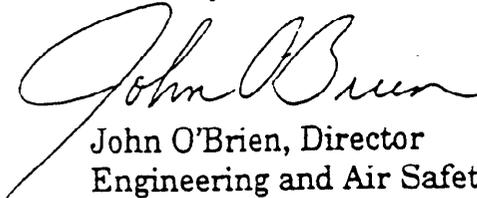
Frequency of Reports

The proposed rule deals with the type of reports required to be filed and the actions specified would update and improve the Operational and Structural Difficulty reporting system to effectively collect and disseminate to the aviation industry clear, concise data that identifies mechanical failures, malfunctions, and defects which may be a serious hazard to the operation of an aircraft.

As previously stated, ALPA supports the basic intent of the FAA in their proposal. However, not specifically addressed in this proposal is a long standing concern we have with the actual frequency of the filing of those reports. This issue is not clearly stipulated in the preamble of the proposed rulemaking. We are aware that operators and certificate holders must comply with those Federal Aviation Regulations which apply to their operations. Historically, ALPA has perceived that there has only been a small percentage of reports which have heretofore reached the database. It is hoped that by revising the reporting procedures and authority for submitting those reports that a more reflective number of "reports to incidents" will be received and recorded.

The continued safe operation of the airplanes flown in the air transportation system is essential. Thank you for the opportunity to comment.

Sincerely,



John O'Brien, Director
Engineering and Air Safety Department

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