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(11)

BT100-EAK-95-179

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

Gentlemen:

Subject: Operational and Structural Difficulty Reports



The Boeing Company agrees with the basic intent of Docket No. 28293. However, careful consideration must be given to using the FAA-modified Air Transport Association (ATA) Specification 100 code since this modified code would result in a major cost impact to the manufacturers and airlines.

Approval of this docket could result in the manufacturers and airlines being mandated to revise hundreds of millions of pages of data currently in world-wide inventories. This is because the modified ATA code goes beyond the present code numbering system. Since the airlines will be required to use this modified code, the airlines may insist that the manufacturers adopt this modified code in their manuals.

These changes will preclude cost effective implementation of this proposal. It is our understanding that this modified code was rejected by the airlines and should be deleted until formally approved.

The information offered to support the requirement for structural difficulty reports suggests that the need stems primarily from aging aircraft. The problems occur on airplanes of any age and need to be reported and resolved. References to aging airplanes implies only those planes should be reported. Therefore, comments that specifically address aging airplanes should be deleted.

In proposed Sections 121.704(d), 125.410(d), 127.314(d), and 135.416(d), the following should be added to the list of required information for reports of structural problems:

"The information provided on the nature of the failure or defect should be as detailed as possible. For example, for cracks, crack lengths (both when initially discovered and just prior to repair) should be provided".

If these source findings are not recorded, future detection standards cannot be validated by service data.

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If you have any questions regarding this matter, please contact Bob Carlson at (206) 234-6669.

Sincerely,

**BOEING**



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