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(7)

DEPT OF TRANSPORTATION

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Federal Aviation Administration
Safety Data Analysis Sec. AFS-643
6500 S. MacArthur Blvd.
P.O. Box 25082
Oklahoma City, OK 73125

PLC: 08

November 02, 1995

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

Comments to this NPRM are as follows;

1. The proposed 121.703 does not ask for sufficient information to do meaningful trend analysis. Attached is an SDR, highlighted with the items this NPRM calls for. Notice that there is no requirement for either part numbers, part names, or legible, meaningful text to accurately describe the failure, malfunction or defect. This is valuable information to effectively trend problems. I suggest that a requirement for this information be included (when available) in these proposed rules.

2. The proposed 121.704 is missing a paragraph that was in the last draft copy. The draft 121.704 (c) read as follows:

(c) Reporting of any failure or defect pursuant to paragraphs (a) or (b) found after the issuance of an Airworthiness Directive or after the issuance of a manufacturer's Service Bulletin resulting from a failure or defect is not required, provided that the failure or defect falls within allowable published limits and restoration of the structure can be accomplished without modification of the published repair data.

This paragraph should be included in the final rule possibly without the inclusion of the reference to the Service Bulletin. If we have an established, accepted repair there is no need to report this information to the SDR data base. If there is no longer a need to report certain items that are on a Minimum Equipment list (MEL) then there should be no need for this. This information will not lend itself to meaningful trend analysis.

Thank you for your concerns,



Robert J Corcoran
Aviation Safety Inspector
AFS-643



U.S. Department
of Transportation
Federal Aviation
Administration

DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

FORM APPROVED
OMB No. 2120-0008

RIS: WS 8070-1	
Control No.	
A	
ATA	CODE
B	

Service Difficulty Report
AERONAUTICAL EQUIPMENT

MAJOR EQUIPMENT IDENTITY

Enter pertinent data	MANUFACTURER	MODEL/SERIES	SERIAL NUMBER	C N- 99999
AIRCRAFT	Boeing	727-223	D 12345	E
POWERPLANT			F	G
PROPELLER			H	I

PROBLEM DESCRIPTION

DATE	STATUS	CARRIER	ATA	AIRCRAFT TYPE	N	CONTROL NO.
8-25-95		AAAA	32			
TEXT						
Flight 30 DFW TT 1350 TC 550						
SPECIFIC PART CAUSING PROBLEM						
J PART NAME	K MFG PART NUMBER	L PART CONDITION		M PART/DEFECT LOCATION		
COMPONENT/APPLIANCE ABOVE PART INSTALLED ON					Report whole hours	N PART TT
P COMP/APPL NAME		Q MANUFACTURER	R MFG MODEL /NUMBER		S SERIAL NO.	
O PART TSO						

SUBMITTED BY

SUBMITTER (Check one)										S	A	B	C	D	E	F	G	H	I	P.S.L.	ALERT	OPER/D.O.		
										CARRIER	REP. STA.	OPER	MECH.	AIR TAXI	MFG.	FAA	OTHER	Spec.						
T	PREC. PROC.	U	NATURE	V	STAGE	STAT	ROLL	FRAME	SYS.	SYS.														
		A		CR																				

ADDITIONAL COMMENTS

All Submitters - Instructions for Completing FAA Form 8070-1

Major Equipment Identity

FILE	ENTRY
Aircraft Powerplant Propeller	Identify major equipment related to problem. Enter manufacturer, model, and serial number per FAA/MANUFACTURER type certificate data sheet. If amateur built, use plan or kit name. Use military model designators when appropriate. Avoid colloquial names and market titles.
N-	Aircraft Registration Number.

Problem Description

Date	Give date problem occurred (i.e., 7-1-84).
Text	Whenever possible, describe conditions subsequent to, or leading up to, the reported problem: (a) Identify the cause for malfunction and emergency measures executed. (b) Include compliance or noncompliance with Airworthiness Directives, Service Bulletins, STC's, and PMA's. (c) Provide any significant fact you feel may help to reduce or eliminate recurrence (i.e., cycles, landings, and suggested changes).
Part Name	Skin, rib, shaft, venturi, transistor, capacitor, etc. Avoid colloquial names.
Mfg. Part Number	Alphanumeric part identifiers assigned by manufacturer.
Part Condition	Cracked, bent, burned, corroded, shorted, etc.
Part/Defect Location	L.H. alternator, audio, R.H. outboard, range switch, etc.
Part TT	Total service time on part in whole hours (i.e., 00531).
Part TSO	Service time on part since overhaul in whole hours (i.e., 00200).
Comp/App'l Name	Fuselage, wing, alternator, carburetor, VOR receiver, etc.
Manufacturer	Comp/appl manufacturer: Beech, Cessna, Prestolite, Bendix, Collins, etc.
Mfg. Model/Number, Serial Number	Alphanumeric model and serial numbers or identifiers assigned by comp/appl manufacturer (i.e., ALU8403, NAS3A1, 51RV1). Do not repeat "MAJOR EQUIPMENT IDENTITY" in these locations.

Submitted By

Submitter	As noted on form.
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FAA District Offices - Refer to FAA Order 8010.2