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November 10, 2000

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

2000-7953 - 460

NOV 29 11 10 AM '00
DEPT OF TRANSPORTATION

Subject: SDR Final Rule

Dear Sir/Madam,

Having read the final rule, I am convinced that the revised reporting requirement will add considerable burden on Evergreen. During the months of April, May, and June of 2000, we filed a total of 10 operational related MRRs for the entire fleet of 17 aircraft (10 747 and 7 DC-9). We reviewed the log pages for 5 aircraft and determined that during the same timeframe we would have to file at least 90 SDRs under the revised rule.

Lets look at the some of the things that the FAA wants the industry to report.

FAR 121.703(a)(5) requires that engine flameout and shutdown during ground operations must be reported. Engine surges or flameouts happen during ground operations due to unfavorable wind conditions (cross/tailwinds). Such flameouts do not necessarily mean that a malfunction occurred. Airlines have procedures that require precautionary shutdown of engines during ground operations. Under the new language, all shutdowns will have to be reported. I can already envision numerous arguments between the airlines and their local FAA as to what constitutes reportable ground shutdown.

FAR 121.703(a)(7) requires that "hazardous leakage" of fuel must be reported. Who will determine what constitutes "hazardous leakage"? Will it be the FAA or the operator? There is a high potential that interpretation will vary based upon individual FAA inspectors.

FAR 121.703(a)(12) requires that failure, malfunction, or defects pertaining to "autothrottle, autoflight, or flight control systems or components of these systems" have to be reported as SDRs. This means is that every time a leading edge flap has to be retracted electrically instead of pneumatically (on a 747); it would have to be reported. Every time a gyro is replaced, it would have to be reported since a gyro is part of the auto-flight system. Every time a knob is



loose or the background light fails on the autopilot control panel, it would have to be reported. One could also argue that problems with INS or GPS systems would also require reporting since they are also part of the auto-flight system.

FAR 121.703(a)(1), (2), (3), (4), (7), and (12) seem to require filing of SDRs regardless of where the discrepancy was discovered – during ground operations/testing or during flight. Does this mean that discrepancies discovered during testing or preflight would require reporting?

FAR 121.704(a)(1) requires all replacements resulting from corrosion, cracks, or disbonding be reported as an SDR. There is no relief for structures that are not primary or principal structural element (PSE) or for minor repairs. Under the rule as written, every clip, bracket, and standoff that is replaced because of crack or corrosion will have to be reported.

FAR 121.704(a)(2) need some clarification. It specifically states, “Corrosion, cracks, or disbonding that requires rework or blendout because the corrosion, cracks, or disbonding exceeds the manufacturers established allowable damage limits”. Corrosion on an aircraft structure always requires removal, which may result in a blendout. This blendout may be well within the manufacturer’s limit and not require any repair. The language of the rule seems to state that all blendouts, even if they are within limits, must be reported.

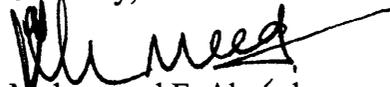
Since FAR 121.704(a)(2) does not differentiate between primary and secondary structure or major or minor repairs, all repairs such as fiber glass patches to interior wall panels, repairs to galley doors, landing gear doors, fairings, closet doors, etc., would have to be reported.

Under provisions of FAR 121.704(a)(3), cracks, corrosion, or disbonding in composite structure that is designated as primary or PSE, must be reported. According to the 747 structural repair manuals, floorboards are designated as primary structures and are made of composite material. This means that all repairs to floorboards must be reported. Also noteworthy is the fact that spoiler, flaps, stabilizers, ailerons, etc. are all considered primary structures and therefore, all repairs to them would also have to be reported either under the provisions of (a)(1), (2), or (3).

The way I see it, between FAR 121.704(a)(1), (a)(2), and (a)(3), all repairs to anything structural will have to be reported.

Perhaps the FAA did not intend for these items to be reported however, the current language of the rule does not support that intention. With airlines reporting all this data, the value of the SDR database will diminish even further.

Sincerely,



Mohammed F. Ahmed

Director Quality Control/Quality Assurance