



Air Transport Association

January 17, 2001

U.S. Department of Transportation Dockets  
Docket No. FAA-2000-7909  
400 Seventh Street SW, Room Plaza 401  
Washington, DC 20590

Subject: Improved Flammability Standards for Thermal/Acoustic Insulation Materials Used in Transport Category Airplanes; Proposed Rule, 65 Fed. Reg., Vol. 183, September 20, 2000

Ladies/Gentlemen:

The FAA has proposed amendments to 14 CFR Parts 25, 91, 121, 125, and 135, regarding improved flammability standards for thermal/acoustic insulation materials used in transport category airplanes. If adopted, these amendments would require that thermal/acoustic insulation materials in Part 121 airplanes meet the new flame propagation test requirements of proposed Sec. 25.856. For airplanes manufactured before a date two years after the effective date of the amendment, these flame propagation test requirements would apply to thermal/acoustic insulation materials installed to replace existing materials. For airplanes manufactured after a date two years after the effective date, these flame propagation test requirements would apply to all thermal/acoustic insulation materials. Further, in airplanes manufactured more than four years after the effective date, the thermal/acoustic insulation materials would have to meet the new flame penetration resistance (ie, burn-through) test requirements of Sec. 25.856.

ATA supports the FAA's efforts to improve the flammability standards for insulation materials used in transport category aircraft. However, we are concerned that certain aspects of the proposal will unnecessarily create implementation difficulties, and that certain aspects have not been adequately justified. Our specific concerns are:

- Air carriers will largely be dependent on aircraft manufacturers to achieve compliance. Aircraft manufacturers must expedite the issuance of insulation specifications, service instructions, and kits, as necessary, to facilitate on-time compliance with both the flame propagation and burn-through test requirements that are proposed for in-service airplanes.
- The benefits of the burn-through test requirements appear overstated because they are based on assumptions about the post-crash integrity of the fuselage that are not supported by experience. (ie, that there will be no holes or tears in the fuselage).

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- The proposal refers to two different specifications for the thickness of a material in the center former of the apparatus to be used in tests of burn-through performance. These dimensions are specified in FAR 25.856 Appendix F, Part VII, Figure 1, and Part VII, (b), (4). This oversight should be corrected.
- Lastly, we recommend that the final rule clearly state that it applies only to insulation of the fuselage pressure vessel. As currently worded, the rule would apply to the insulation internal to the fuselage, such as the insulation of internal components, which cannot provide burn-through protection to occupants.

We appreciate the opportunity to contribute comments to this proposed rulemaking and thank you for your consideration of these views.

Sincerely,

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Joe White

Director, Aircraft Systems Engineering

Cc: Jeff Gardlin, Transport Airplane Directorate, ACS, ANM-115, 425-227-1149  
AEC, EMMC

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