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DEPT. OF TRANSPORTATION MAINTENANCE & ENGINEERING CENTER

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

Subject: Service Difficulty Reports (SDR), Response to Final Rule RIN 2120-AF71

Reference: Final Rule RIN 2120-AF71

Dear Sir or Madam:

The following comments are provided in response to the subject Final Rule:

The rationale given in the preamble of this final rule states the FAA was prompted to amend the reporting requirements for air carriers because of an internal FAA review of the effectiveness of the reporting system and by air carrier concern over the quality of the data being reported. American Airlines (AA) does not feel there is a problem with the quality and effectiveness of the present system. It is our opinion that this new final rule excessively burdens the industry with additional requirements with little to no value to the safety of the flying public. We emphatically believe this rule, as written will be anti-productive and inconsequential to safety.

Method of Submission:

We recognize the FAA's mandate to report in a method acceptable to the administrator is vague and does not clarify what reporting requirements will be acceptable. We currently forward our SDR information in a form that allows for rapid processing through our maintenance organization, and include a review by our Certificate Management Office (CMO). Mandatory changes to the reporting process will shift the burden of processing from the FAA to AA, and eliminate positive input from our CMO.

Value of Data:

The FAA response concerning "Value of Service Difficulty Reports" states "In the past, the SDR database may not have been utilized to its fullest potential. Some reporting requirements were subjective; causing inconsistent reporting which could lead to analysis of incorrect data and errors

in trend analysis." American could not agree more in the truthfulness of this description. However, we disagree the new rule will clarify or allow any better interpretation of data. We feel there were no significant changes to the rule that will substantially improve the quality of the reportable information.

Currently, American submits over 2,000 Mechanical Reliability Reports (MRR) every year. Reviewing previous data that was not considered reportable under the MRR rule but would be reportable under the new SDR rule, will cause American to increase their reportable items by an estimated 250 + percent annually.

In the response to the NPRM concerning SDRs, another airline states: "That the existing service difficulty database serves little benefit. They believe that if any analysis is done based on this database, it is transparent to the operator," that there is "undue burden to operators to control data on parts to meet the SDR reporting information requirement." Another carrier states "that they have seen no demonstrated increase in safety as a result of mandatory service difficulty reporting." Another carrier states the structural item reporting for heavy maintenance to be "totally unacceptable." Another carrier states once a recurring problem has been addressed, repetitive reporting "adds no value." American Airlines voiced our concerns this new rule would be a very time consuming, labor intensive exercise, and may have little or no value. These statements, from some of the major carriers, should reveal to the FAA this rule may be adding unnecessary burden that will add additional cost to the flying public with no perceptible increase in safety. Since any item of significance is already being communicated to the FAA, manufacturers, and to other carriers by effective programs, like the "lead airline" program, the new SDR rule will not add value to safety of the flying public.

Structural SDRs:

FAR 121.704(a) will require each failure or defect related to corrosion, cracks, or disbonding that requires replacement of the affected part regardless of primary or secondary will require possibly thousands of minor items be reported. We feel this part of the final rule should be amended to clarify primary structural components or parts.

Reporting Deadline:

The FAA mandating the reporting of SDRs within 96-hours from the time of discovery for aircraft undergoing heavy check is overly burdensome. The industry practice is to report the SDR within the required time after the aircraft has been returned to service. This change in policy will have a significant impact on American as well as other carriers. SDRs associated with heavy maintenance are typically structural reporting requirements. The expanded reporting requirements in the new rule will cause a significant increase in the number of SDRs. This

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increase, coupled with the requirement to report the items within 96-hours from the time of discovery, will force the industry to change the way SDRs are reported. Structural items that require reporting usually take several days to work and repair. The data required for an SDR report will not be available until the repair process is completed; therefore, causing the operator to submit an "Open" report, that will not expose any knowledge on what was amiss, and shortly thereafter causing a "Supplemental Closed" report to be submitted. Tracking will not only be burdensome but nearly impossible. Currently, our SDRs generated from heavy maintenance check are consolidated and sent to a central department for reporting to the FAA. By forcing air carriers to report structural type reports 96-hours from the time of discovery, instead of from the time the aircraft returns to service, will cause additional and unnecessary administrative burden as well as removing highly trained technicians from performing maintenance. American Airlines anticipates this requirement will require additional staff to keep up with the new administrative workload. Adding staff to address administrative issues and preventing technicians from performing maintenance is not in the best safety interest of the flying public.

The value of the expanded structural reporting requirement must be questioned. The industry already gathers and reports structural repair data that is mandated by Airworthiness Directives. Reporting this information under the SDR program clearly is a duplication of effort.

If this change goes into effect, we request the reporting time be increased to ten (10) business days to allow additional research time and for the other reasons cited.

Expansion of Reportable Items:

The new rule requiring all failures, malfunctions, or defects of an emergency evacuation system or component has no added merit. We agree with the FAA example of an evacuation slide component contained inside the slide to last as long as the slide. We object to those items such as emergency exit floor path lights that burn out, or batteries that are depleted from being left on overnight. The number of reportable items involving emergency system components such as battery packs, lamps, and light strips would increase significantly. These high maintenance components do not render the system inoperable and do not add information to the SDR database that is safety related.

Reporting Time and Cycles:

We strongly disagree with the new requirement of reporting time and cycles of the affected component. This only adds additional administrative workload for the certificate holders and their vendors to supply the data. Additionally, this information is not always available or extremely difficult to ascertain. The number of supplemental reports will increase substantially due to the 96-hour reporting requirement and the associated research time.

Cost Summary:

American Airlines believes the new requirements in reporting of SDRs will be a tremendous and inequitable burden laden on the certificate holders. At American Airlines, this unessential expenditure is projected to be \$1,150,000 in the first year of the new mandate.

This expenditure would include the following:

- \$3,000 for new computer hardware
- \$260 per month for service maintenance agreement on equipment to continue to process SDRs in the same manner as it does today
- \$50,000 in training costs
- \$378,000 in additional cost for the increased reporting requirements
- Potentially \$50,000 to develop a new computerized form to meet the requirements of the new reporting requirements
- \$213,000 for the stringent requirements of reporting structural SDRs.
- \$500,000 increase in annual cost for additional staff to process the increase in reportable items and the increase in duplicate handling to meet the 96-hour reporting requirement.

\$1,150,000 is extremely un-proportional to the \$67 a year FAA estimate. The FAA's cost estimation does not reflect real world costs and this alone should be convincing enough to have the rule rescinded. We believe that all part 121 certificate holders will be significantly impacted if this rule is not rescinded.

American Airlines is adamantly opposed to Final Rule RIN 2120-AF71 and recommends FAA rescission. The FAA should review this issue with the industry Aviation Rulemaking Advisory Committee (ARAC).

Sincerely,



Jeff Jones
Managing Director
Quality Assurance

JJ:MLK