



Association of European Airlines

DEPT. OF TRANSPORTATION

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U.S. Department of Transportation
Dockets Docket No. FAA-2000-7909 - 33
400 Seventh Street SW.
Room Plaza 401
Washington, DC 20590

18th January, 2001

Dear Sir/Madam,

Subject: Comments to NPRM Docket No. FAA 2000-7909, "Improved Flammability Standards for Thermal Acoustic Insulation Materials used in Transport Category Airplanes"

The Association of European Airlines (AEA), representing 29 European airlines operating over 2000 aircraft, would like to comment on the proposed rule:

1. Flame Propagation

In most cases there is an afterflame time up to one second. However, the AEA would like to propose the following criteria:

- no flame penetration after five seconds and
- the after flame time has to be an average,

because the testing is too susceptible for human errors. The material will afterburn very easily if the burner is not removed quickly enough.

2. Wording of Para 25.853

The wording of Para 25.853 "or equivalent approved FAA test method" should be revised to "approved equivalent test method".

3. Missing Round Robin Tests

There are no sufficient number of Round Robin test results available for the burnthrough and flame propagation tests to define finally the tolerances for these tests.



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4. Cost

The AEA believes that the costs for the aircraft modification will exceed the estimates of the NPRM. There exists additional cost factors such as long ground times, documentation, engineering, scrapping according to the environmental regulations and small modifications on aircraft structure to allow proper blanket installation. Therefore, the cost analysis of this NPRM should be revised.

Yours sincerely,

A handwritten signature in cursive script that reads 'Hanna Tiainen'.

Hanna Tiainen
Assistant Technical Affairs