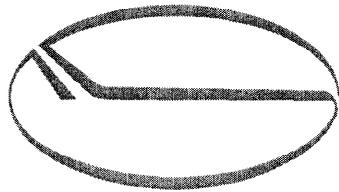


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Air Transport Association

July 14, 2001

FAA-01-9637-5

Dockets Management System
U.S. Department of Transportation Dockets
Room Plaza 401
400 Seventh Street SW
Washington, DC 20590-0001

Subject: Notice of Proposed Rulemaking, Docket No. FAA-2001-9637, re: **Electrical System Fire and Smoke Protection**, 66 Fed. Reg., Vol. 94, May 15, 2001

Ladies/Gentlemen:

The FAA proposed to amend the airworthiness standards for transport category airplanes concerning the protection of electrical system components. Adopting this proposal would eliminate regulatory differences between the airworthiness standards of the U.S. and the Joint Aviation Requirements of Europe, without affecting current industry design practices. The proposal would revise Sec. 25.869(a) to adopt the more stringent language in the parallel JAR 25.869(a). Concurrently, FAA proposed Advisory Circular (AC) 25.869-1X, "Electrical System Fire and Smoke Protection," which would provide guidance on the means of showing compliance with the proposed requirements of Sec. 25.896(a). Final issuance of proposed AC 25.869-1X is contingent on the final adoption of the proposed changes to Sec. 25.869(a).

Member airlines of the Air Transport Association provided the attached comments to the proposed Rule. The commenters concur with the proposal as written, however, one recommends that the rule clearly state that the revised standards apply to new production airplanes only.

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

Sincerely,

Joe White
Director, Aircraft Systems Engineering

Docket No. FAA-2001-9637

July 14, 2001

Pg. 2

Cc: Massoud Sadeghi, ANM-111, Seattle ACS, fax 425-227-1320
AEC

Attachments

/01Ac050

From: Cecelia Christie [via e-mail]

Sent: Wednesday, June 13, 2001 5:27 PM

To: White, Joe

Cc: Allen White; Gerry Burns; Janice Tedford; John W Clark; Lester Wagner; Lisa Gibbs; Marilyn King; Mike Keller; Pat Hawley; Ray E Morgan; Rick Hardmeyer; Rick Yorman; William Bartelt

Subject: MEMO NO. 2001-AE-050 & 051

Attn: Joe White

Ref: Memo No. 2001-AE-050 & 051

Subject: Fire Protection of Electrical System Components on Transport Category Airplanes -
Proposed Airworthiness Standards

American Airlines has reviewed the ref memorandum which advises of a proposed change to FAR 25.869(a). This change would expand the requirements of FAR 25.869(a) to apply not only to the fuselage, but throughout the airplane including engines. These changes would apply to airframe manufactures and manufactures of electrical components. Suggested guidance to help comply with this change are listed in detail in advisory circular 25.869-1X.

Boeing indicates that they have been complying jointly with FAR's and JAR's since 1990.

American concurs that a change to FAR 25.869(a) to eliminate regulatory differences between the FAR's and JAR's is good for the future of the aviation industry. American also concurs with the guidance provided in advisory circular 25.869-1X. These changes should apply to aircraft or electrical components manufactured after the date the FAR is changed. The FAR change should not be retroactive to aircraft manufactured before this new regulation is enacted.

Mark Boes

Director of Aircraft Engineering



Maintenance Operations

July 6, 2001

Air Transport Association of America
1301 Pennsylvania Ave., NW, Suite 1100
Washington, D.C. 20004-1707

Attention: Mr. Joe White
Director, Aircraft Systems Engineering

Subject: Fire Protection of Electrical System Components on Transport Category Airplane-
Proposed Airworthiness Standards

Reference: (1) ATA Memo 01-AE-050
(2) ATA Memo 01-AE-051

Dear Mr. White,

The reference ATA Memo advised of and requested comments on the subject proposed rule that will require U.S. manufacturers of aircraft electrical system components used throughout the aircraft (including engines) to comply with the more stringent requirements of JAR 25.869(a) if they plan to sell them overseas. It would require that insulation on electrical wire and cables installed in any part of the airplane must be self-extinguishing. Because the proposed standard is currently being followed, we believe the impact would be minimal. We concur with the contents of the proposed rule and have no additional comments.

Sincerely,


J. M. Gay
Chief Engineer

cc: Clay Satterlee, United Airlines - SFOEG