

TO: Jose Figueroa, AFS-330:

On behalf of the member air carriers of the Air Transport Association (ATA) of America, please add the following input to the subject SDR final rule, Docket No. FAA-2000-7952.

Several weeks ago I mentioned to you that one of our ATA air carrier members had done a comparison of the new JASC with the current ATA coding scheme used by all of our members. I have attached a spreadsheet that clearly shows the SIGNIFICANT differences, and re-emphasizes the tremendous burden switching to JASC for the new SDR rule will impose! NOTE: This attachment is being submitted separately in the Docket Management System.

In summary, the table shows:

- 1) - they (the ATA air carrier), use 258 ATA codes, but JASC has 547 codes (112% more).
- 2) - between the ATA code definitions and the JASC definitions, only 127 codes match (only 49% of ATA, and only 23% of JASC).

Even if JASC is imposed for only SDR reporting, you can see that JASC could force the air carrier to recode perhaps 75% of the discrepancies! This is a monumental undertaking!

I honestly believe that the folks at AFS-600 do not realize that the ATA coding was developed for content and format control of aircraft documentation and publications, not for the ease of discrepancy analysis. Believe me, our air carriers' reliability groups would love to see the ATA coding changed for their benefit, but they also recognize that such a change would either require all aircraft related documents and publications to be reformatted retroactively (that is NOT going to happen), or they subsequently will lose the in-service functionality of the ATA coding which easily allows the technicians to relate discrepancies to existing aircraft documents and publications (e.g., the AMM) for ease of troubleshooting, etc.

ATA fully understands the "pressure" being placed upon reporting wiring-related failures, we also have already added a reporting guideline in ATA iSpec2200 (which replaced ATA Spec100) to recognize a subchapter --97 (strictly for reporting purposes, such as with SDRs), we do NOT support the massive changes imposed by JASC, strictly for the benefit of a few people in AFS-600 who are tasked with analyzing the SDR data . . . the air carriers have "lived" with this "shortcoming" of the ATA coding scheme for years, and do a very good job.

AS A COMPROMISE, I would like to propose that you seriously consider withdrawing the JASC from SDR reporting under the new final rule, and instead allow the air carriers to continue using their ATA code, but with the addition of a subchapter --97 to wiring-related failures within each basic ATA chapter. This will begin supplying the wire-related data that is being sought, and only require the air carriers a minor recoding/retraining requirement.

Again, I can appreciate that JASC would make it easier for the AFS-600 folks to perform SDR analysis across the entire range of ATA codes, but that "wish" on their part does not justify the massive imposition it would require on all air carriers, aircraft documents and publications. The simple inclusion of ONLY a subchapter --97 can be handled by the air carriers, and will start supplying readily identified wire-related failure information to the FAA.

Thank you for your serious consideration of this situation.

Regards,

Richard W. Anderson  
Director, Maintenance & Materiel  
Air Transport Association (ATA) of America  
1301 Pennsylvania Avenue, NW  
Suite 1100  
Washington, DC 20004-1707  
USA  
202-626-4134 tel  
202-626-6576 fax  
randerson@airlines.org