

Safety Regulation Group
Requirements and Policy Unit



VIA <http://dms.dot.gov>

Our Ref: 9/61/10CD

3rd February 2003

Docket Management System
US Department of Transportation
Docket No. FAA-1999-5401
Room Plaza 401
400 Seventh Street SW
Washington DC 20590-0001

Dear Sir,

Attention Rules Docket No: FAA-1999-5401 Aging Airplane Safety

Please accept the attached comments on the Interim Final Rule; request for comments.

Thank you for the opportunity to take part in your rulemaking process.

Yours faithfully,

Michael Poole
Surveyor

Civil Aviation Authority

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UK CAA Comments to Docket No FAA-1999-5401

There are two issues related to the 2010 end date stated in the rule that need further consideration: -

- a) Considerations of Widespread Fatigue Damage indicate that to avoid a significant safety concern an end date operational limit much sooner than 2010 would be appropriate for a number of aircraft types covered by this rule. This fact should be highlighted in the preamble;
- b) The rule text would indicate that any type that can wait until 2010 before having a SID by declaring and publishing a DLG. Was this intended?

There is a fundamental question regarding the relationship of this Interim Final Rule to the existing and proposed ageing aircraft rulemaking. In the draft AC91-56 it is stated that Widespread Fatigue Damage will be the subject of separate rulemaking, but little detail is given of how service bulletin reviews should be carried out or the way of working for ageing aircraft programmes. It is understood that the European Ageing Aircraft Working Group has submitted text to the FAA docket for inclusion in AC91-56 to cover these points. The CAA supports the inclusion of such text in both AC 91-56 and AC91-60.

The CAA strongly endorses the approach of stating life limitations [sometimes called Design Service Goals DSG or Design Life Goals DLG] as a point that cannot be passed until further evidence about structural integrity is provided. However these life limitations need to be established either on an equal basis, or the effect of the differences accounted for. As previously stated CAA believe it is unfair to quote lives in the same table where one has been established on a judgement basis for a safe life aircraft with limited testing (e.g. PA 31) but another has been subjected to full damage tolerance testing (e.g. SD360). Furthermore the DLG quoted for the 360 is not in line with the limitation stated in the maintenance manual for that aircraft, which it is understood had FAA Brussels approval on 26th May 1996.

Fuselage repairs were identified in the preamble to the previous rulemaking on repairs as the highest priority, with Repair Assessment Programmes being instituted at three quarters of the Design Service Goal. Now in this interim final rule all the remaining structure has to be addressed within 4 years, which is far more onerous and seemingly impractical. The CAA fully supports the inclusion of the total airframe structure in the assessment of repairs as the only logical approach. However it is suggested that the incorporation time should be aligned with the pressure boundary structure rule.

From experience with that repairs rule on the pressure boundary it is only repairs that inhibit baseline inspections or create a new PSE that need to be considered. An approach for the classification of repairs similar to that adopted for the pressure boundary should be followed rather than include all major repairs.

Considering that AC91-60 is now being used to guide operators of aircraft in scheduled operations albeit of smaller size the nature of the guidance does not seem appropriate. Many of the observations are simplistic in nature. The list of components to consider for inclusion needs editing for duplication and would be better expressed in more general terms.

Please clarify whether the proposed AC 120xxx/aar is intended to address structural issues only.