

Comments to Docket No. FAA-2002-13458

British Airways PLC has the following comments with respect to Docket No. FAA-2002-13458, 'Development and Implementation of Corrosion Prevention and Control Programs'.

British Airways support the objectives of the proposed rule, but feel the proposed rule could be enhanced by consideration of the comments provided. British Airways is aware the rule is not directly applicable to UK operators.

CPCP affected structure

The preamble to the proposed rule makes reference to the CPCP being applicable to Primary structure.

'A measure of the effectiveness of a CPCP is the level of corrosion damage found on primary structure during repeat scheduled inspections.'

(Preamble to proposed rule, 'Background', third from last paragraph)

British Airways has previously provided comments with respect to proposed AC120-CPCP. These comments concerning primary structure and principal structural elements (PSE's) are also pertinent to the proposed rule. These comments are repeated below:

The last sentence of paragraph 1-4 'FAA APPROVAL OF A CPCP' states the operators CPCP should address all corrosion likely to affect Primary Structure. Other sections of the proposed AC also refer to Primary Structure.

Previously FAA mandated CPCP's have been applicable to Principal Structural Elements (PSE's). For example, FAA AD90-25-05 amendment 39-6790. Docket No. 89-NM-271-AD mandates Boeing Model B747 classic D6-36022, this document states,

'The effectiveness of a corrosion control program is determined for a given airplane area by the level of corrosion found on Principal Structural Elements (PSE's) or other structure listed in the baseline program, during repeat scheduled corrosion program inspections.'

(D6-36022 rev. E, page 1.1-1)

'Maintenance programs for affected airplanes must include a corrosion prevention and control procedure that limit corrosion findings, on all PSE's and other defined structural areas, to level 1 or better.'

(D6-36022 rev. E, page 3.1-1)

Advisory Circular AC 25-1529-1, dated 01/08/91 provides definitions for PSE and Primary structure. As stated in AC 25.1529-1, PSE's are a sub category of Primary structure. As such, the magnitude of the structure affected by the proposed AC would

be greater than that required by existing mandated programs. British Airways feel that existing mandated corrosion programs have provided a high degree of safety and the associated airworthiness risk has abated. As such, British Airways request the proposed AC should be amended to state PSE structure in lieu of Primary structure.

Type Certificate Holder (TCH) responsibilities

The proposed rules are operational rules and as such the rules are applicable to operators only. As such the operating rules do not place any obligations on TCH's to support the development of CPCP's.

British Airways is concerned of the ability of operators to develop CPCP's where they have small fleets of aircraft or where an operator has only one aircraft in the particular model type. In these instances, the operator is unlikely to possess sufficient statistical data or experience in order to support program development.

The consequence of this proposed rule if it is not amended is likely to lead operators of some aircraft types to withdraw them from service prematurely and incur the associated costs.

British Airways believe the FAA should consider additional rule-making that would complement these proposed operational rules and oblige the TCH to assist operators in development of CPCP.

Corrosion Level 1 definition

The corrosion level 1 definition provided in sections 121.376a, 129.24, and 135.426 is not the consistent with the current industry standard definition (the definition is reproduced from the B747 classic CPCP document, other document such as maintenance planning documents – MPD's, are similar). The definition currently used is reproduced below. The underlined words highlight the significant change omitted from the proposed definition.

'LEVEL 1 CORROSION

Corrosion damage occurring between successive inspections, that is local and can be re-worked/blended-out within allowable limits as defined by the manufacturer (e.g. SRM; SB; etc.);

OR,

Corrosion damage occurring between successive inspections, that is widespread and can be reworked/blend-out well below allowable limits as defined by the manufacturer;

OR,

Corrosion damage that exceeds allowable limits and can be attributed to an event not typical of the operator's usage of other airplanes in the same fleet (e.g. Mercury spill);

OR,

Operator experience over several years has demonstrated only light corrosion between successive inspections but latest inspection and cumulative blend-out now exceed limit.'

(Boeing document D6-36022 rev E page 1,1-2)

If the corrosion level definition provided in the AC is not amended to contain the omitted reference to widespread corrosion, industry will be working to a dual standard. If the original premise for the original definition has altered and therefore the statement is no longer required, all existing Airworthiness Directives, Aircraft Maintenance Programs (AMP's), and other associated documents should be amended to meet the revised definition of level 1 corrosion.

The key implication of the omitted statement is that widespread corrosion that is not well below allowable limits should be categorised as level 2. The proposed definition may lead operators to categorise this type of corrosion as level 1 as it is within limits.

British Airways request the FAA to include the underlined portion of the current industry standard definition provided above in the proposed rules.