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U.S. Department of Transportation  
400 Seventh Street, SW  
Nassif Building  
Room PL-401  
Washington, DC 20590-001

**Attention: Rules Docket No. FAA-2004-17168- / 7**

Subject: Request for Comments, Review of Existing Regulations; Federal Register,  
February 25, 2004, Page 8575

Ladies/Gentlemen:

The following three items, in priority order, are regulations in 14 CFR Chapter I that ABX Air believes should be amended to make them more effective and less burdensome.

**1. Section 25.857**

There is a conflict between §§ 25.857 and 121.583 in regards to carrying supernumeraries aboard a cargo airplane. ABX Air recommends changing 25.857(e) to permit supernumeraries specified in § 121.583 to be carried aboard airplanes with a Class E compartment. This would eliminate the lengthy exemption petition and public comment process for a decision that has historically been approved by the applicable aircraft certification office.

**2. Sections 121.370, 121.370a, & Proposed Wide Spread Fatigue Damage Rule**

There are overlaps between §§ 121.370, 121.370a, the proposed section of Wide Spread Fatigue Damage, and various "Aging" ADs in Part 39. ABX Air recommends a committee be assigned to coordinate and eliminate duplication between these rules.

**3. Part 39 – Airworthiness Directives**

The following ADs are recommended by ABX Air to be removed to eliminate the cost of tracking and maintaining records for these ADs that are no longer necessary.

AD 91-15-15, Amendment 39-7079 requires certain Protective Breathing Equipment mask assemblies to be modified. The affected mask assemblies were manufactured before February of 1991. The mask assemblies are life limited to ten years, six months after date of manufacture. Therefore, as of August of 2001, none of the affected masks will be installed on any aircraft. ABX Air recommends removing amendment 39-7079 from Part 39.

## Review of Existing Regulations

May 20, 2004

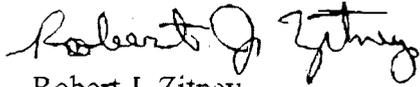
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AD 93-14-12, Amendment 39-8636 requires certain Protective Breathing Equipment mask assemblies to be modified. The affected mask assemblies were manufactured before October of 1991. The mask assemblies are life limited to ten years, six months after date of manufacture. Therefore, as of April of 2002, none of the affected masks will be installed on any aircraft. ABX Air recommends removing amendment 39-8636 from Part 39.

AD 84-18-07, Amendment 39-4915 requires certain discharge cartridges to be inspected for erroneously placed aluminum foil in the electrical connector pins. The affected cartridges have a life limit of 6 years. The affected cartridges were manufactured no later than August 7, 1984. Therefore, all affected cartridges have been removed and cannot be installed on an airplane after August of 1990. ABX Air recommends removing amendment 39-4915 from Part 39.

AD 91-08-51, Amendment 39-7031 requires AFM revision and a placard installed for airplanes equipped with a Honeywell Flight Management System that has a navigational database pre cycle 9104. The navigational databases are updated monthly. No flight crew will be using a 13-year-old navigational database today. ABX Air recommends removing amendment 39-7031 from Part 39.

Regards,



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Manager, Quality Assurance