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AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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October 13, 2004

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street S.W.
Nassif Building, Room PL-401
Washington, DC 20590

FAA-2004-18999-6

Subject: Docket No. FAA-2004-18999; Airworthiness Directives; Boeing Model 747-400, -400D, and -400F Series Airplanes

Dear Sir or Madam:

On behalf of the 64,000 airline pilots at 42 airlines represented by the Air Line Pilots Association, International (ALPA), we submit comments in support of the proposed AD.

This proposed AD would require replacing at least one Flap Control Unit (FCU) located in the main equipment center, with a new or modified FCU having P/N 285U0011-208. For certain airplanes, the proposed AD would first require replacing the three FCUs having P/N 285U0011-205 or 285U0011-206 with FCUs having P/N 285U0011-207. The replacement would be required within 60 months of the effective date of the AD, or within 25,000 flight hours or within 4,000 flight cycles, whichever occurred first.

Given the potential severity of the situation this could cause (i.e., landing without flaps) and the nature of the proposed modifications, ALPA supports the intent of the subject NPRM. However, ALPA feels that a 60-month compliance time is too lengthy and should be shortened substantially. It is our understanding that the availability of the parts necessary to complete the modifications is not an issue.

ALPA appreciates the opportunity to comment.

Sincerely,

Pierre Huggins
Staff Engineer
Engineering & Air Safety Department

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