

I am submitting these comments on behalf of Horizon Air in response to Airworthiness Directive 2004-18-03, Docket No. FAA-2004-18993; Directorate Identifier 2004-NM-125-AD.

The following requirements in the AD creates an unnecessary burden, economically and operationally, on Horizon Air. The leak check involves pulling two circuit breakers in order to perform the check. Contrary to the AD, Horizon Air firmly believes that this task can be performed by pilots and does not need to be done by maintenance personnel. Horizon pilots are trained in the procedures for opening and closing circuit breakers, since they are sometimes tasked to do this, under the direction of Maintenance via radio, to troubleshoot some malfunctions. Requiring this task to be done by a mechanic imposes an economic burden when performed at stations where Horizon maintenance personnel are not available. Contract mechanics, who are not qualified to run the engines on the CRJ 700, would have to be called out to open and reset the circuit breakers while the pilots run the engines. This will result in added cost due to the expense of utilizing vendor maintenance, additional duty time for pilots, departure delays do to the time required to complete the leak check and additional delays that cascade as the result of the initial departure delays. Requiring earlier show times for pilots in order to complete this task in time to meet scheduled departure times may not always be feasible due to crew rest requirements and additional duty time.

Although the Canadian airworthiness directive specifies that the pilots receive a briefing on the procedure in use for the leak check, this AD does not require that briefing, since the pre-flight procedures associated with performing the leak check should be accomplished by appropriate maintenance personnel.

Horizon Air requests that this paragraph be revised to delete the requirement that the leak should be accomplished by appropriate maintenance personnel and replace the text stating that the check may be accomplished by the flight crew or maintenance personnel.

#### Daily Operational Leak Checks

(m) Once a day, before the first flight of the day: With both engines operating at ground idle or taxi thrust, open both L&R XFER SOV circuit breakers, 1N9 and 2P8, and monitor the fuel quantity of the center fuel tank for five minutes, in accordance with Part A of the Accomplishment Instructions of CRJ 700/900 Regional Jet (Bombardier) ASB 670BA-28-025, Revision A, dated December 15, 2003. For the daily check, the fuel quantity in the center fuel tank must be 4,000 pounds or less.

Note 3: If the center fuel tank contains fuel when doing this check, the following engine indicating and crew alerting system (EICAS) caution message may be displayed: ``L XFER SOV and/or R XFER SOV.''

If the proposed alteration of the AD is not acceptable, Horizon Air requests that paragraph (m) be modified to delete the words, "before the first flight of the day." The requirement to perform the leak check once a day should accomplish the same goal as performing the check prior to the first flight. Flight crews are already required by procedure to monitor the center tank fuel quantity for 10 minutes, with the boost pumps operating, prior to each flight. They are also

required by procedure to monitor the center tank fuel quantity during flight to be alert for any indications of a leak into the center tank.

The procedural issues in place provide an adequate safety margin for conducting the leak check once per day, at a facility where Horizon Air maintenance personnel are available, rather than prior to the first flight of the day. Horizon flight crews are fully qualified and competent to open and reset the circuit breakers and conduct the check, if necessary.

Respectfully Submitted,

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