AIR TRANSPORT ASSOCIATION

October 18, 2004

Docket Management Facility,
U.S. Department of Transportation,
Attention: Docket No. FAA-2004-18998, Directorate Identifier 2003-NM-253-AD
400 Seventh Street SW.,
Nassif Building, Room PL–401,
Washington, DC 20590.

Subject: B737, B757, DC-10, MD-10 and MD-11 Reinforced Flight Deck Door System and Maintenance – Comments on Proposed Rule

Ladies/Gentlemen:

FAA has proposed a new airworthiness directive (AD), applicable to certain B737, B757, DC-10, MD-10 and MD-11 airplanes as listed in the referenced bulletin, to supersede an existing AD. The existing AD currently requires modification of the reinforced flight deck door. This proposed AD would expand the applicability of the existing AD and require other actions related to the reinforced flight deck door. These other actions include modifying the door, inspecting and modifying wiring in the area, and revising the maintenance program to require more frequent testing of the decompression panels of the flight deck door. ATA appreciates the opportunity to comment on this proposed rule.

Our members generally support the intent of the rulemaking; however, additional review and clarification would be desirable on the attached comments. Specifically:

- Compliance – Whilst no compliance deadline is specified any timing is dependent on parts being available
- Applicability – Reference to McDonnell Douglas 737/757 is incorrect.
- Placards – Clarification is requested regarding the reference to modification in accordance with the applicable service bulletin. The provision of sufficient placards that are referred to in the service bulletin are in doubt.
- Door Modification – Clarification is requested on:
    - Smoke screen
    - Wiring modification
    - Decompression panel function check intervals

AIR TRANSPORT ASSOCIATION OF AMERICA, INC.
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Your serious consideration of these observations and comments would be greatly appreciated.

Sincerely,

Robert Peel
Director of Quality
Air Transport Association

Attachments (4)

Alaska Airlines

8 October 2004

Air Transport Association of America
1301 Pennsylvania Ave. NW
Suite 1100
Washington, DC 20004-1707

Attention: Mr. Robert Peel
Director of Quality

Subject: B737-CL & NG – Reinforced Flight Deck Door System & Maintenance - Proposed Rule

Reference:
(A) Memorandum No. 04-AD-346
(B) Docket 2003-NM-253-AD
(C) C&D Aerospace Alert Service Bulletin B221200-52-01
(D) C&D Report CDR B22-69, revision E, November 8, 2002

Dear Mr. Peel,

Alaska Airlines has reviewed FAA's Notice of Proposed Rulemaking 2003-NM-253-AD, and the referenced C&D Aerospace Bulletins. The NPRM as published affects our 737-200C, -400, -700, and –900 aircraft. We are not opposed to this rulemaking provided there are adequate parts available to accomplish the modification of the service bulletins within the eighteen month compliance period. The six month maintenance program incorporation requirement is also acceptable.

Thank you for the opportunity to provide comments. If you have any questions, please call me at (206) 392-9700.

Sincerely,

Joseph E. Gockowski III
Interim Manager of Technical Compliance
Alaska Airlines
P.O. Box 68900-SEAMJ
Seattle WA 98168-0900

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October 4, 2004

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

Subject: Comments on Proposal to supersede airworthiness directive on C&D Aerospace flight deck door

Reference: /A/ Docket No. FAA-2004-18998; Directorate Identifier 2003-NM-253-AD
/B/ Airworthiness Directive (AD) 2003-14-04, Amendment 39-13223, dated July 2, 2003
/C/ C&D Aerospace Service Bulletin B221001-52-03, Rev.3 dated March 25, 2003
/D/ C&D Aerospace Service Bulletin B231001-52-02, Rev.4 dated March 19, 2003
/E/ C&D Aerospace Service Bulletin B221200-52-01, Rev.1 dated June 27, 2003
/F/ C&D Aerospace Service Bulletin B221001-52A02
/G/ C&D Aerospace Service Bulletin B221001-52A05, Rev.2

To Whom It May Concern:

The FAA has issued a request for comments on the proposed Reference /A/ that would supersede Reference /B/ if adopted. Reference /A/ would expand the applicability of Reference /B/ and would require additional actions. America West Airlines (AWA) supports the overall intent of Reference /A/, which we feel is to improve the safety of the C&D Aerospace flight deck door, but AWA does have some concerns with portions of Reference /A/.

AWA accomplished decompression latch modifications per References /C/ and /D/ when mandated by Reference /B/. A clear operational and safety issue existed, and modification per References /C/ and /D/ was, and is a clear answer. AWA has also completed the installation of the armor plate on all AWA installed C&D flight deck doors per Reference /E/. A design issue with the deadbolt was discovered, and a clear fix was provided by the manufacturer. The inspection and rework suggested in Reference /F/ was also completed by AWA. Reference /F/ resolves a known issue of design and installation. Unfortunately, AWA is concerned that there are certain portions of Reference /A/ that do not fall into the pattern of clearly defined issues with a clearly defined answer. The first issue, improving the cockpit smoke barrier, is not cited in Reference /A/, and the second issue, no manufacturer service bulletin has been issued to support the strengthening of the flight deck door smoke screens. AWA does not support the wire modification suggested in Reference /G/. Even though the door manufacturer has provided information to modify the aircraft, AWA feels that the modification is not needed. The manufacturer does not have knowledge of AWA's established operational procedures. Before each flight, AWA flight crews check the door operation. During flight, it is prohibited for passengers to linger in the forward galley area, which would be required to gain access to the suspect wires. A breach of the cockpit door system would require intimate knowledge of the flight deck door to tamper with the wiring, sophisticated tools that are not allowed to be carried by passengers, and a failure of the deadbolt system, which was improved via

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Reference /E/. AWA believes that such a series of events is highly improbable. AWA does not support the portion of Reference /A/ that would increase the repetitive functional test of the decompression panel latches of the reinforced flight deck door. No need has been cited in Reference /A/ that justifies a change in the inspection intervals. AWA finds that the current inspection interval is sufficient and recommends that more operational data be gathered and reviewed prior to implementation of this requirement. If the operational data supports an inspection interval change, be it an increase or decrease in frequency, AWA recommends that Reference /A/ be revised to include such an interval change.

AWA feels that neither the public nor the FAA will benefit by the release of Reference /A/ as it stands today.

Regards,

Jody Stofleth
Director, Airframe Engineering

JBS/tl

c: Terry Littleman
Aaron Bricker

UNITED AIRLINES

United Services

September 17, 2004

Air Transport Association of America
1301 Pennsylvania Ave., NW, Suite 1100
Washington, D.C. 20004-1707

Attention: Mr. Robert Peel
Director of Operations

Subject: 737 & 757 Flight Deck Door Modification
Docket No. NPRM 2003-NM-253-AD

Reference: ATA Memo 04-AD-346

Dear Mr. Peel,

The referenced ATA Memo advised of and requested comments on the subject proposed rule that will supersede an existing AD 2003-14-04. This new amendment requires additional modifications, and updates the maintenance program for the reinforced flight deck door. Although we concur with the intent of the proposed rule, we offer the following comments.

In Paragraph 2(f)(1), the requirements of AD 2003-14-04 state to "modify the upper and lower pressure relief latch assemblies on the flight deck door by doing all actions specified in and according to..." The new requirements in paragraph 2(j) simply state to "modify the reinforced flight deck door by doing all applicable actions specified in the applicable service bulletin listed in Table 3". The C & D Aerospace Service Bulletins listed for 737 and 757 includes installation of placards to show service bulletin incorporation. The statement from AD 2003-14-04 implies that the placards are not required. With the current proposed wording, we would be required to install and maintain the placards to be in compliance. We have contacted C & D Aerospace and they are unable to provide additional placards should the original one in the kit be lost or need to be replaced. As a result, we request that the proposed AD exclude the SB paragraphs that install the placards from the final AD requirements.

Sincerely,

CBF
For JMM

Jim Miccio
Acting Chief Engineer

San Francisco International Airport, San Francisco, California 94128

cc: R. Bernicchi, United Airlines - INDEG
M. Kamalabad, United Airlines - INDEG
J. Covington, United Airlines - INDEG
P. Sesny, United Airlines - SFOEG
K. Yau, United Airlines - INDEG
R. Vculek, United Airlines - INDEG

Peel, Robert

From: Karen Mullins [Karen_Mullins@aa.com]
Sent: Tuesday, September 14, 2004 11:25 AM
To: rpeel@airlines.org
Subject: ATA Assignment NPRM Memo 2004-346

September 14, 2004

ATTN: Robert Peel - rpeel@airlines.org

REF: (1) ATA Memorandum 04-AD-346, dated 3 September 2004
(2) Docket No. FAA-2004-18998 (Directorate Identifier 2003-NM-253-AD)
(3) ATA Memorandum 03-AD-209 Dated 30 June 2003 (AD 2003-14-04)

SUBJECT: B737, B757, DC-10, MD-11 Reinforced Flight Deck Door System and Maintenance - Proposed Rule

FAA has proposed the supersedure of AD 2003-14-04, applicable to the noted aircraft types, which affects the continued maintenance practices and final assembly of the Enhanced Security Flight Deck Door produced by C&D Aerospace. Of the changes proposed to the AD in the Ref (2) document, only 2 affect American Airlines: the reduced maintenance interval introduced by Report B22-69* Revision E (Continued Maintenance Requirements); and completion of C&D Service Bulletin B221200-52-01 to install the ballistic protection in proximity to the deadbolt.

Comments:
The inspection interval noted in Report B22-69 Rev E was immediately adopted by AA upon release by C&D. AA has been tracking accomplishment of the testing and is working with C&D aerospace to extend the testing requirements beyond the current 3000 Flight Hours set forth in the report.

Completion of SB B221200-52-01 causes little hardship on AA assuming parts are readily available from C&D aerospace. The proposed rule does not specifically state the compliance deadline for this action, though the minimum proposed timeline of 6 months is acceptable.

* The Proposed Rule details Report B22-69 as applicable "...to certain McDonnell Douglass Model 737 and 757 series airplanes." It is inferred that this is a typographical error and should reference the models as Boeing Aircraft Company models.

Regards,

Mark Boes
Director
Aircraft Engineering

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