



AIR TRANSPORT ASSOCIATION

October 21, 2004

Docket Management Facility,  
U.S. Department of Transportation,  
Attention: Docket No. FAA-2004-19003 (Directorate Identifier 2003-NM-245-AD)  
400 Seventh Street SW.,  
Nassif Building, Room PL-401,  
Washington, DC 20590.

**Subject:** B737 – Main, Forward, and Aft Cargo Door Surround Structure – Comments on Proposed Rule

Ladies/Gentlemen:

FAA proposes to adopt a new airworthiness directive (AD) for all Boeing 737-100, -200, -200C, -300, -400, and -500 series airplanes. This proposed AD would require repetitive inspections for cracks in the fuselage skin, doubler, bearstrap, and frames surrounding the main, forward, and aft cargo doors; and repair of any cracking. This proposed AD also would require inspections of certain existing repairs for cracking, and related corrective action if cracking is found. 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:

- Inspections – Clarification is required regarding inspections of existing repairs around the doors. Also the timetable is dependent on sufficient supply of spares.
- Repair – Similar repair instructions as those for 737- 100/200 airplanes need to be available.

Your serious consideration of these observations and comments would be greatly appreciated.

Sincerely,

Robert Peel  
Director of Quality  
Air Transport Association

Attachments



United Services

October 11, 2004

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

Attention: Mr. Robert Peel  
Director of Quality

Subject: 737 Cargo Doors Fuselage Skin, Doubler, Bearstrap & Frames  
Docket No. NPRM 2003-NM-245-AD

Reference: ATA Memo 04-AD-352

Dear Mr. Peel,

After reviewing the contents of the subject NPRM, we offer the following comments:

Clarification is needed regarding inspections of existing repairs around the cargo doors. Inspections are to be accomplished per SB 737-53A1228 Figures 8, 9 and 10. It is unclear what inspection is required if repairs are of a different configuration than the referenced figures. For example, a repair of the cargo door lower corner per SRM 737-100/200, Figure 46, Detail IV, does not match the Figure 8 repair in the SB. Verbiage needs to be added clarifying the "intent" of the inspection. If the intent is to accomplish a MFEC inspection of all outer row fasteners of the repair doubler, no matter the configuration, it should be so stated.

Repair instructions for damaged skin, doubler and bearstraps around the cargo doors need to be available for the 737-300/400/500 airplanes, similar to those currently available for the 737-100/200 airplanes. It is crucial to limit downtime of aircraft as much as possible. Coordinating repair procedures with Boeing extends the out of service time of the affected airplane.

Thank you in advance for conveying these comments to the FAA. If you have any questions, or if you require additional information regarding our position, please contact Alanna Crafton at (317) 704-6783.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Miccio". To the right of the signature, there is a handwritten note "CBS for Jim".

Jim Miccio  
Acting Chief Engineer

San Francisco International Airport, San Francisco, California 94128

cc: R. Bernicchi, United Airlines - INDEG  
M. Kamalabad, United Airlines - INDEG  
P. Sesny, United Airlines - SFOEG  
A. Crafton, United Airlines - INDEG

# Alaska Airlines

12 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 – Main, FWD, Aft Cargo Door Surround Structure – Proposed Rule

Reference: (A) Memorandum No. 04-AD-352  
(B) Docket 2003-NM-245-AD  
(C) Boeing Alert Service Bulletin 737-53A1228, July 10, 2003

Dear Mr. Peel,

Alaska Airlines has reviewed FAA's Notice of Proposed Rulemaking 2003-NM-352-AD, Boeing Alert Service Bulletin 737-53A1228. The proposed action would affect only our 737-200C and -400 fleets. Based on the proposed detailed inspections and intervals we will be able to accommodate the required accomplishments within heavy maintenance visits. This requirement is acceptable provided there are adequate parts available if the discrepant condition is found.

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  
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Seattle WA 98168-0900