



AIR TRANSPORT ASSOCIATION

October 21, 2004

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

Subject: Docket No. FAA-2004-18999; Directorate Identifier 2003-NM-259-AD;
Airworthiness Directives; Boeing Model 747-400, -400D, and -400F Series Airplanes, re:
Main Equipment Center Flap Control Unit, 69 Fed. Reg., Vol. 172, September 7, 2004

Ladies and Gentlemen:

FAA has proposed a new airworthiness directive (AD), applicable to B747-400, -400D, and -400F airplanes as listed in Boeing Alert Service Bulletin 747-27A2386, dated March 13, 2003, that would require replacing at least one flap control unit (FCU) having P/N 285U0011-207 in the main equipment center with a new or modified FCU having P/N 285U0011-208, per the bulletin. Replacement would be required at the earliest of the following times:

- Within 60 months after the effective date of the AD.
- Within 25,000 flight hours after the effective date.
- Within 4,000 flight cycles after the effective date.

For airplanes listed in Boeing Service Bulletin 747-27-2319, dated January 24, 1991, the AD would require, before or concurrently with the above action, replacement of the three FCUs having P/N 285U0011-205 or 285U0011-206 with new or modified FCUs having P/N 285U0011-207 per that bulletin.

Member airlines of the ATA concur with the intent of the proposal, but offer the attached recommendations. The recommendations address a redundant provision in the proposal, and an apparent error in instructions for testing FCUs.

We appreciate the opportunity to contribute comments to this proposed rulemaking, and thank you for your consideration of these views.

Sincerely,

Joe White
Director, Engineering

Docket No. FAA-2004-18999
Pg. 2
October 22, 2004

Cc: Douglas Tsuji, ANM-130S, Seattle ACO, 425-917-6590
B747 Operators

JW/04-AD-351

Encls/

Department Number
C8020
Northwest Airlines, Inc.
5101 Northwest Drive
St. Paul, MN 55111-3034



September 28, 2004

Mr. Joe White
Director, Aircraft Systems Engineering
Air Transport Association of America
1301 Pennsylvania Avenue NW, Suite 1100
Washington, DC 20004-1707

Subject: B747-400 Main Equipment Center Flap Control Unit – Proposed Rule

References: 1. ATA Memo No. 04-AD-351
2. Docket No. FAA-2004-18999; Directorate Identifier 2003-NM-259-AD
3. Boeing Service Bulletin 747-27A2386, dated March 13, 2003

Dear Mr. White:

Docket Number FAA-2004-18999 is intended to prevent disconnection of autoland/autopilot functions and the loss of primary flaps control and flaps indication due to the disengagement of all three Flap Control Units (FCUs) at the same time. The simultaneous disengagement of all three FCUs could lead to a non-normal high speed landing with the flaps retracted, increased pilot workload, and possible runway departure at high speed during landing.

NWA does not object to the intent of this NPRM, but does offer the following comment for the FAA's consideration in the final rule.

- Paragraph (g) requires "For airplanes listed in Boeing Service Bulletin 747-27-2319, dated January 24, 1991: Before or concurrent with the accomplishment of paragraph (f) of this AD, replace the three FCUs having P/N 285U0011-205 or 285U0011-206 with new or modified FCUs having P/N 285U0011-207 in accordance with the Accomplishment Instructions of Boeing Service Bulletin 747-27-2319, dated January 24, 1991."

Paragraph (f) requires that at least one P/N 285U0011-208 FCU be installed in accordance with Boeing Alert Service Bulletin 747-27A2386, dated March 13, 2003. Paragraph 2.B. of the Boeing Alert Service Bulletin already states that the Alert Service Bulletin can not be accomplished until the changes given in Service Bulletin 747-27-2319 have been made. NWA believes that this eliminates the need for paragraph (g) of the NPRM.

- Alert Service Bulletin Paragraph 3. B. (Work Instructions) step 2 specifies to "Do the FCU BITE test as specified in 747-400 AMM 27-51-51."

Boeing 747-400 AMM Revision 49, dated October 18, 2003, does not have a BITE test in either 27-51-00/501 (Trailing Edge Flap System – Adjustment/Test) or 27-51-51/401 (Flap Control Unit – Removal/Installation). NWA believes that Paragraph 3. B. 2. of

the Alert Service Bulletin not only references a test that does not exist but is also unnecessary. Paragraph 3. B. 1 replaces the FCU per Figure 1 and Figure 1 step 2 installs the FCU in accordance with AMM 27-51-51. This AMM reference performs an Operational Test of the FCU which includes both a Central Maintenance Computer initiated Ground Test and exercising the flaps through full travel to ensure proper operation and indication.

Please contact Jared Kirsling at 612-726-4788 if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "Mark Millam". The signature is fluid and cursive, with the first name "Mark" being more prominent than the last name "Millam".

Mark Millam
Chief Engineer

cc: R. Fox
J. Kirsling
S. Terrio



September 29, 2004

Air Transport Association of America
1301 Pennsylvania Ave., NW, Suite 1100
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Attention: Mr. Joe White
Director of Engineering

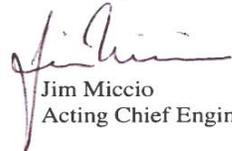
Subject: 747-400 Main Equipment Center Flap Control Unit (FCU)
Docket No. NPRM 2003-NM-259-AD

Reference: ATA Memo 04-AD-351

Dear Mr. White,

The referenced ATA Memo advised of and requested comments on the subject proposed rule that will require installation of modified FCUs. We concur with the contents of the proposed rule and have no additional comments.

Sincerely,



Jim Miccio
Acting Chief Engineer

cc: C. DeRubira, United Airlines - SFOEG
P. Sesny, United Airlines - SFOEG
S. Grzech, United Airlines - SFOEG

