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October 21, 2004

B-H210-04-0503

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street SW
Nassif Building, Room PL-401
Washington, DC 20590
Attention: Airworthiness Rules Docket No. FAA-2004-19003-1/



Subject: **Comments, NPRM Docket No. FAA-2004-19003 (Directorate Identifier 2003-NM-245-AD) – Inspections for Cracks in the Fuselage Skin, Doubler, Bearstrap and Frames Surrounding the Main, Forward and Aft Cargo Doors, Model 737**

Reference: (a) NPRM Docket No. FAA-2004-19003
(b) AD 93-14-10
(c) Service Bulletin 737-53A1228

Boeing has reviewed the subject NPRM and provides the reference (a) comments.

Issue #1

In paragraph (b) of reference /A/, a sentence should be added stating that compliance with this AD constitutes compliance with the reference /B/ AD.

Justification:

The inspections and repairs per the reference /A/ proposed AD cover all of the requirements, and are equivalent or more conservative then the reference /B/ AD.

Issue #2

In paragraph (f) of reference /A/, the first sentence states:

“Do the applicable detailed, general visual, and low and high frequency eddy current inspections for cracks...”

This should be changed to add reference to mid frequency inspections as follows:

“Do the applicable detailed, general visual, and low, mid and high frequency eddy current inspections for cracks...”

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Justification:

There are requirements for mid frequency inspections contained in the reference /C/ service bulletin that must be accomplished.

Very truly yours,



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LJR