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EMBRAER

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FAC-SÍMILE

Ref.: GEC-3892/2004	Date: 27 October 2004	Page: 1/2	JCMR/jcmr
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To: Docket Management Facility
 U.S. Department of Transportation
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 Washington DC, USA

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From: Paulo César Olenscki
 Certification Manager *FAA - 2004-19176-9*

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Subject: NPRM Docket No. 2003-NM-36-AD

Dear Sir:

Embraer technical position regarding the electric fuel pumps part numbers 2C7-1 and 2C7-4 is that they are equally airworthy as long as inspected at every 1,200 flight hours (FH) and 8,000 FH respectively, according to the Brazilian airworthiness directive 2000-08-01R2, dated February 13, 2002. To avoid confusion when inspecting an aircraft with both part numbers installed the Brazilian airworthiness directive allows the inspection of the electric fuel pumps at every 8,000 FH only after all fuel pumps P/N 2C7-1 of the aircraft are replaced with fuel pumps P/N 2C7-4.

Embraer understands that the action determined in the SB 145-28-0013, dated April 25, 2001, is technically acceptable as a 'terminal action' preventing fuel tanks and surrounding areas from ignition sources, as periodic inspections and anti-corrosion spray application within short intervals were effective, avoiding the blackening and damage of the P/N 2C7-1 pumps. Since the SB release, there is no shop visit report of failed pumps due to the blackened pins; pumps with blackened pins were properly functioning when removed during the required inspection. The pump P/N 2C7-4 is understood as an improvement which can extend the period of the inspections. Also, the results of the SFAR 88 critical analysis, presented in the report 145-FU-016 Vol. 1, states that the pump P/N 2C7-1 when properly maintained, according to the SB 145-28-0013, dated April 25, 2001, fulfill the requirements.

Based on the arguments presented above Embraer does not agree with the proposed airworthiness directive requiring the EMB-145 operators to replace the electric fuel pump P/N 2C7-1 only with P/N 2C7-4 and we suggest the following changes to the text in Docket No. 2003-NM-36-AD:

(1) Replace paragraph (k):

"If any evidence of a discrepancy is found during any inspection required by paragraph (i) of this AD: Before further flight, replace the electric fuel pump with a new electric fuel pump that has part number (P/N) 2C7-4, in accordance with the Accomplishment Instructions of EMBRAER Service Bulletin 145-28-0013, dated April 25, 2001. After the replacement, repeat the inspection required by paragraph (i) of this AD at the applicable interval in that paragraph."

By the following text:

"If any evidence of a discrepancy is found during any inspection required by paragraph (i) of this AD: Before further flight, replace the electric fuel pump with a serviceable component. After the replacement, repeat the inspection required by paragraph (i) of this AD at the applicable interval in that paragraph."

(2) Completely remove paragraph (l)

(3) Replace paragraph (m):

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EMBRAER	Ref.: GEC-3892/2004	Date: 27 October 2004	Page: 2/2
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"Before further flight after replacing a fuel pump, as required by paragraph (k) and (l) of this AD..."

By the following text:

"(m) Before further flight after replacing a fuel pump, as required by paragraph (k) of this AD..."

(4) Completely remove paragraph (o).

Sincerely,


Sergio Augusto Viana de L.
Certification Office

P/ Paulo C. Olenski
Certification Manager