



## AIR TRANSPORT ASSOCIATION

July 13, 2007

Docket Management Facility  
U.S. Department of Transportation  
Attention: Docket No. FAA-2007-28355; Directorate Identifier: 2006-NM-062-AD  
400 Seventh Street SW  
Nassif Building, Room PL-401,  
Washington, DC 20590

**Subject:** B737 Ground Block Inspection - Proposed Rule, Request for Comments

Ladies/Gentlemen:

The FAA proposes to adopt a new rule, which applies to Boeing model 737-600, -700, -700C, -800, and -900 series airplanes. The proposed rule would require operators to inspect ground blocks GD261 and GD264 for corrosion, measure resistance, separate ground wires, and perform corrective actions as necessary.

ATA received comments from two operators regarding the proposed change, discussing the following:

- Both operators are concerned with the cost of compliance estimates. Both feel the cost estimates noted in the NPRM are very low. The first operator notes that the Boeing Service Bulletin cost estimates are four times higher than the FAA estimates. The second operator highlights that all affected aircraft require the separation of the ground wires and estimates for this work will add approximately 3.55 hours to the estimates. Both operators request that the cost estimates should be reviewed and changed accordingly.
- The second operator has concerns with the Service Bulletin accomplishment instructions. The Heads Up Guidance System (HGS or HUD) circuit breakers require opening and closing to remove and restore power from the ground block 261 when accomplishing the Service Bulletin work. The instructions reference incorrect circuit breaker numbers for certain aircraft in their fleet. Boeing was contacted and committed to provide a Service Bulletin revision and the date of the revision has not been provided.
- The second operator also notes the Service Bulletin instructions are not applicable to all aircraft with the HUD installation. Wiring differences noted in the attached comments state that Service Bulletin 737-28-1257 has non-applicable work instructions based on a variance in their STC installation. Again, the operator contacted Boeing and was assured that their input was correct and the operator would expect a revision to the Service Bulletin to follow.

ATA strongly urges the proposed rule be changed to reflect the comments above and attached to reflect the appropriate cost estimates and to preclude any AMOC requirement from being filed when the proposed rule is issued as an Airworthiness Directive.

Thank you for consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Lopez". The signature is written in a cursive style with a large, stylized initial "M".

Mark Lopez  
Director, Engineering and Maintenance

Enclosures



June 14, 2007

Mark Lopez  
Director, Engineering and Maintenance  
Air Transport Association

**Subject: NPRM 2007-216, June 6, 2007; B737 Ground Block Inspection –  
Proposed Rule, Request for Comments**

Ref: 1) Docket No.: FAA-2007-28355; Directorate Identifier 2007-NM-062-AD; June 6, 2007  
2) Boeing Special Attention Service Bulletin 737-28-1257, dated February 26, 2007

Dear Mr. Lopez:

AAL concurs with the 24 month compliance timeframe and plans to incorporate S/B 737-28-1257 during our Light C-Check visits.

AAL would like to note that the FAA's AD cost analysis is very low in comparison to the cost stated in the Boeing S/B upon which the AD is based. The Boeing man-hour estimates are four times higher than the FAA's estimates.

Sincerely,

H. A. Demarest  
Managing Director, Aircraft Engineering  
American Airlines

HAD:JB/ce



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30320-6001

July 12, 2007

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**Subject**           Docket No. FAA-2007-28355; Directorate Identifier 2007-NM-062-AD]

The proposed rule is issued to address a potential for failure of all six boost pumps resulting in the potential for flame out of both engine while operating on suction feed. The rule proposed this action be accomplished within 24 months of the AD effective date.

Delta Airlines offers the following comments:

DAL operates 71 aircraft which will be affected by the proposed rule.

Engineering concurs that action is required to separate the boost pump grounds to remove the single point of failure.

Issues with Cost of Compliance

Engineering notes that the NPRM Costs of Compliance section specifies that the proposed AD will require 1 work hour. Engineering feels that this is inaccurate. The proposed action requires the inspection, corrective action of any inspection discrepancies, and the separation of the grounds. Engineering notes that it is possible that not all aircraft will have inspection discrepancies and therefore labor estimates for the ground block replacement or any other repair of discrepancies would not be included in the Costs of Compliance. However, all aircraft subject to the proposed AD will require the separation of the grounds. Therefore, Engineering believes that the work hour estimate for the separation of the grounds must be included in the Costs of Compliance. Accordingly, Engineering believes that the correct work hours associated with the proposed AD should be 4.55 work hours - 1 work hour for inspection plus 3.55 work hours for the separation of the grounds based on the manpower estimates of SB 737-28-1257 and that the costs should be changed accordingly.

Issues with SB 737-28-1257 Accomplishment Instructions

With respect to the Accomplishment Instructions of SB 737-28-1257, DAL has encountered issues with regard to the Heads Up Guidance System (HGS or HUD).

The reference service bulletin specifies instructions for aircraft having HUD system installed (Part 2 Step 1.d, Part 4 Steps 1.d and 6.d). These instructions open and close the HUD circuit breakers in order to remove and restore power from the wires in Ground Block 261 when accomplishing the SB work.

- These instructions specify the incorrect circuit breaker number for certain DAL aircraft. On these aircraft the HUD OHU DC circuit breaker is C01623 and not C01555 as specified by the SB. DAL has queried Boeing on this issue. Boeing verified that C01623 is the correct circuit breaker number for these DAL aircraft. Boeing committed to revising the SB correct this information, however the issue date of this revision is not scheduled.
- These instructions are not universally applicable to all aircraft having a HUD system installed. Certain DAL aircraft have a HUD system installed per a Flight Dynamics STC. These aircraft are not wired the same as the HUD system referenced by SB 737-28-1257, they do not have a HUD OHU DC circuit breaker and the HUD wiring does not pass through Ground Block 261 or 264 and therefore the SB work instructions Part 2 Step 1.d, Part 4 Steps 1.d and 6.d for aircraft with a HUD installed are not applicable for these aircraft. DAL has coordinated with Boeing on this issue, and Boeing has confirmed that if the ground blocks GD261 and GD264 do not have wires from HUD, there is no impact from HUD, so it is not necessary to remove power by opening C1555 or C1623 (as applicable), as given in Step 1.d. of Part 2 and Step 1.d. of Part 4.

DAL would request that the proposed rule be changed to make allowances for the discrepancies within SB 737-28-1257 as detailed above in order that it would be unnecessary to petition for an AMOC if and when the proposed rule is issued as an Airworthiness Directive.

If you have any further questions on this subject, contact Lemuel Watkins - Program Manager, AD/Regulatory Programs, at (404) 714-6762.

Regards,



Kenneth C. Lorow Jr.  
Senior Program Manager - AD/Regulatory Programs