



AIR TRANSPORT ASSOCIATION

August 7, 2006

Docket Management Facility,
U.S. Department of Transportation,
Attention: Docket No. FAA-2006-24487; Directorate Identifier 2006-NE-13-AD;
400 Seventh Street SW.,
Nassif Building, Room PL-401,
Washington, DC 20590.

Subject: PW4000 - Machining Nonconformance Front Turbine Hub Anti-Rotation Slots – Proposed Rule

Ladies/Gentlemen:

The FAA proposes to adopt a new airworthiness directive (AD) for Pratt & Whitney PW4074, PW4074D, PW4077, PW4077D, PW4084D, PW4090, PW4090-3, and PW4098 turbofan engines, with certain front turbine hub part numbers installed. This proposed AD would require a onetime visual inspection of the anti-rotation slots in the front turbine hub, for a machining nonconformance, and its replacement if the inspection failed. 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:

- **Alternative to Mechanical Engraving:** allow the electrolytic etch marking method as it is flush with the hub marking surface, and leaves no raised material to wear into the mating part.
- **Forwarding of Findings:** Many operators have these parts inspected by third party overhaul facilities. The logistics of forwarding findings from the third party to the operator, and then on to Pratt & Whitney does not enhance airworthiness, and technically could lead to an AD violation if a report were lost or misplaced.

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

Sincerely,

Robert Peel
Director, Quality

Enc.



AIR TRANSPORT ASSOCIATION OF AMERICA, INC.

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Maintenance Operations

July 20, 2006

Air Transport Association of America
1301 Pennsylvania Ave. NW, Suite 1100
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Attention: Mr. Robert Peel
Director of Quality

Subject: PW4077/90 T-1 Hub Anti-Rotation Slot Inspection
Docket No. FAA-2006-24487
Directorate Identifier 2006-NE-13-AD

Reference: ATA Memo No. 06-AD-205

Dear Mr. Peel:

The referenced ATA Memo advised of, and requested comments on, the subject proposed rule that will require inspection of the T-1 hub anti-rotation slots installed in PW4077 and PW4090 engines. We have reviewed the subject NPRM and have several comments.

First, we concur with the inspection, and have been accomplishing it for several months. However, we request an alternative to mechanical engraving, for marking the Service Bulletin 72-282 accomplishment, as specified in P&W SB PW4G-112-72-282. Specifically, we request that "Accomplishment Instructions, Item 1.c.1", allow the electrolytic etch marking method (P&W SPOP 401). The marking area specified in the SB is a mating surface with the T-1 rotating airseal. Mechanical marking processes leave raised material that affects the mating part and drives up subsequent repair costs. The electrolytic etch method is flush with the hub marking surface, and leaves no raised material to wear into the mating part. Electrolytic etch markings are covered during the repairs to prevent their removal. Many parts in the high-pressure turbine (HPT) currently use this method of identification.

Second, we request that the forwarding of a findings report to P&W representatives, as specified in P&W SB PW4G-112-72-282, "Accomplishment Instructions Item 2", be optional as far as AD compliance is concerned. Many operators have these parts inspected by third party overhaul facilities. The logistics of forwarding findings from the third party to the operator, and then on to



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Pratt & Whitney does not enhance airworthiness, and technically could lead to an AD violation if a report were lost or misplaced.

In conclusion, we agree with the proposed AD, but request the option of marking accomplishment using electrolytic etch (P&W SPOP 401), and elimination of the findings report requirement.

Sincerely,

A handwritten signature in cursive script that reads 'Hopes for Jim Miccio'.

Jim Miccio
Director, Powerplant Engineering

cc: Karen Walters, United Airlines – SFOEP
Marty O'Hagan, United Airlines – SFOEP
Ron Judson, United Airlines – SFOEP
Barbara Iwata, United Airlines - SFOEG / ERAC