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B-H210-07-01170

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-2007-29043



**Subject: Comments, NPRM Docket No. FAA-2007-29043 (Directorate Identifier 2007-NM-177-AD), "Inspections That Will Give No Less Than The Required Damage Tolerance Rating for Each Structural Significant Item", Airplane Model 737 Classics**

Boeing has reviewed the subject NPRM and provides the enclosed comments.

Very truly yours,

*SW Moore*  
*for 10.3.07*

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Enclosure: Comments, 2 pages

NPRM Comments Template

<b>Comment #1 ★</b>	
What does the commenter request?	<p>Changes in the words that describe the airplanes AC 91-56 apply to. Change “This guidance material applies to transport airplanes that were certified under the fail-safe requirements of part 4b (“Airplane Airworthiness, Transport Categories”) of the Civil Air Regulations or <u>damage tolerance structural</u> requirements of part 25 (“Airworthiness Standards: Transport Category Airplanes”) of the Federal Aviation Regulations (FAR) (14 CFR part 25), and that have a maximum gross weight greater than 75,000 pounds.”</p> <p>To:</p> <p>“This guidance material applies to transport airplanes that were certified under the fail-safe and fatigue requirements of part 4b (“Airplane Airworthiness, Transport Categories”) of the Civil Air Regulations or fail safe and fatigue requirements of part 25 (“Airworthiness Standards: Transport Category Airplanes”) of the Federal Aviation Regulations (FAR) (14 CFR part 25), and that have a maximum gross weight greater than 75,000 pounds.”</p>
How is the request justified?	<p>The 737-300/-400/-500 was certified to 14 CFR part 25.571 Amdt 0, except for the strut. This amendment did not include the damage tolerance requirement. That was added at amendment 45. In addition, the purpose statement of AC 91-56 states that the guidance material is applicable to airplanes certified under the fail-safe and fatigue requirements of 14 CFR part 25, prior to Amendment 25-45.</p>
List paragraphs that change; describe (non-obvious) changes.	<p>This is in the first paragraph under “Issuance of Advisory Circular (AC)”.</p>

<b>Comment #2 ★</b>	
What does the commenter request?	<p>That the words “repairing cracked” structure be removed from the following sentence; “Revision E describes procedures for revising the FAAapproved maintenance inspection program to include inspections that will give no less than the required damage tolerance rating (DTR) for each SSI, doing repetitive inspections to detect cracks of all SSIs, and repairing cracked structure.”</p>
How is the request justified?	<p>Revision E does not describe procedures for repairing cracked structure. This is even states later in the NPRM; “Revision E does not specify instructions on how to repair certain conditions.”</p>
List paragraphs that change; describe (non-obvious) changes.	<p>The paragraph under “Relevant Service Information”</p>

Comment #3 ★	
What does the commenter request?	In paragraph (h) of the last sentence from “specified in Section 3.0, Implementation of Revision E.” to “specified in their maintenance and inspection program, as revised in accordance with paragraph (g) of this AD.”
How is the request justified?	Section 3 of Revision E does not specifically describe how the inspection intervals are developed. It points to the DTR Check forms contained in Revision E. Paragraph (g) of this NPRM will require the operator to revise their maintenance program to provide no less than the required DTR for each SSI listed in the SSID and tells them how to accomplish this. This is a much better description of the inspection intervals development than pointing the operator to Section 3 of Revision E.
List paragraphs that change; describe (non-obvious) changes.	Paragraph (h) of the proposed rule language.

Comment #4 ★	
What does the commenter request?	An allowance of time to determine alternate inspections that will be required when a repair prohibits the ability to accomplish the required inspection. We request a time period of 12 months from the time the repair is discovered at the initial inspection.
How is the request justified?	AD 98-11-04 R1 paragraph (e) allows up to 12 months to determine alternate inspections should a repair prohibit the required inspection. This could be done by Boeing requesting a fleet AMOC that would allow for this 12 month, similar to what was done after release of the 747 SSID AD, but including this in the rule language will assist the operator.
List paragraphs that change; describe (non-obvious) changes.	Not currently included