



AIR TRANSPORT ASSOCIATION

November 14, 2007

Docket Management Facility,
U.S. Department of Transportation,
Attention: Docket No. FAA-2007-28059
400 Seventh Street SW.,
Nassif Building, Room PL-401,
Washington, DC 20590.

Subject: Rolls-Royce RB211 Intermediate Pressure Compressor Rotor Balance Land

Dear Sir or Madam:

The Air Transport Association (ATA) appreciates the opportunity to comment on a recently proposed Airworthiness Directive (AD) docketed at FAA-2007-28059.

We submit the following remarks, provided by American Airlines, subsequent to ATA member review:

- Rolls-Royce Overhaul Information Notice (OIN), Reference 4, was issued regarding the proper balance weight removal and installation procedures to avoid potential damage to the balance land that could initiate a crack.
- New delivery engines produced after the issue date of OIN Reference 4 should be exempt from the inspection requirement of this AD>

Please see the attached letter for complete details.

We appreciate your serious consideration of these comments.

Sincerely,

Craig Fabian
Director of Technical Operations

Enclosure

AmericanAirlines®

MAINTENANCE & ENGINEERING

October 29, 2007

Craig Fabian
Director, Technical Operations
Air Transport Association
1301 Pennsylvania Avenue, NW Suite 1100
Washington, DC 20004-1707

Subject: NPRM Docket No. FAA 2007-28059, Directorate Identifier 2007-NE-13-AD, Rolls-Royce RB311 Trent 800 Series Engines Intermediate Pressure Compressor Shaft Inspection

Reference 1. NPRM Docket No. FAA-2007-28059, Directorate Identifier 2007-NE-13-AD
2. RR Non-Modification Service Bulletin 72-AF260, Revision 1, dated 17Jan07
3. RR Non-Modification Service Bulletin 72-AF313, Basic, dated 22Feb07
4. RR Overhaul Information Notice No. 65, Issue 1, dated 08Dec06

Reference 1 outlines the requirement to inspect the Intermediate Pressure Compressor (IPC) Shaft Stage 8 balance land for cracking and is based on two Rolls-Royce Non-Modification Service Bulletins (NMSB) as identified in the References section. A single Trent 800 high cycle shaft has been discovered with a crack in this location. Reference 2 outlines the procedure for visual inspection at engine shop visit when sufficient access of the area is afforded while Reference 3 outlines an on-wing borescopic inspection. Reference 3 is also an acceptable inspection method for shop engines that are not scheduled to expose the balance land. AA has both engine shop and on-wing inspection programs in place based on these requirements and is in compliance with the intent of the reference SB's. Every engine in AA's fleet at the time of Reference 3's release has been inspected by one of the two methods with no findings.

Rolls-Royce continues to monitor one time inspection findings to determine if an inspection threshold or repetitive inspection is needed. Based on Rolls-Royce analysis of the cracked IPC shaft, an Overhaul Information Notice (OIN), Reference 4, was issued highlighting proper balance weight removal and installation procedures to avoid potential damage to the balance land that could initiate a crack. Therefore AAL suggests that new delivery engines produced after the issue date of Reference 4 be exempt from this inspection.

If you have any questions, comments or concerns, please feel free to contact Tim Cory, Sr Engineer, at Tim.Cory@aa.com or by phone at (817) 224-0215

Regards,



Rod Blake

Managing Director
Powerplant Engineering
American Airlines

RB:tc/lm

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