



Continental Airlines, Inc.
PO Box 4623 HQJEZ
Houston TX 77210-4607

March 25, 2008

Manager Systems and Equipment Branch
ANM-130S, FAA,
Seattle Aircraft Certification Office
1601 Lind Avenue, SW.,
Renton, WA 98055-4056
Attention: Jen Pei,
Fax 425-917-6590

Reference: A/ NPRM FAA-2008-0269
B/ 28-AWL-20
C/ Boeing Service Bulletin 737-28A1201, dated February 19, 2007
D/ Honeywell Service Bulletin 1151932-24-61
E/ Honeywell Service Bulletin 1151934-24-62
F/ TDG Aerospace STC (ST02076LA)
G/ TDG Aerospace 737NG AMM supplement 20-3202-0001

Dear Mr. Pei,

In response to the ref. /A/ FAA's proposed rule, requiring the replacement of the power control relays in the P91 and P92 power distribution panels for the fuel boost and override pumps with new GFI relays as well as the repetitive operational checks in accordance with the ref. /B/ AWL. Continental Airlines has reviewed the ref. /A/ NPRM and related documents and the comments below are submitted for your consideration.

- The ref. /A/ NPRM requires the installation of the ground fault interrupter (GFI) relays to prevent pump housing burn-through due to electrical arcing. However, the **GFI** relay also known as a **ground fault circuit interrupter (GFCI)**, or an **appliance leakage current interrupter (ALCI)** or a **residual current device (RCD)**, or **residual current circuit breaker (RCCB)**, is an electrical wiring device that disconnects a circuit whenever it detects that the flow of current is not balanced between the phase ("hot") conductor(s) and the neutral conductor, or the ground. This device protects ungrounded 3-phase AC loads by vector summing their currents in the core of an internal current transformer. When a ground fault above a prescribed threshold level and time duration is detected, the GFI relay is tripped and the main contacts are opened to interrupt the fault. As far as I know, electrical arcing is a localized, high-energy event and the GFI relay is not an Arc Fault Circuit Interrupter (AFCI) that is designed specifically to prevent fires by detecting non-working electrical arcs and disconnect power before the arc starts a fire.

- The ref. /A/ NPRM requires the installation of the ground fault interrupter (GFI) relays in accordance with the ref. /C/ Boeing bulletin as the primary source and the ref. /D/ and /E/ Honeywell bulletins as an additional source of service information. The ref. /A/ NPRM, paragraph (f), note 2, indicates the ref. /D/ and /E/ revision date November 10, 2006. The ref. /C/ Boeing bulletin, figures 1 and 2 that provide the instructions for the GFI installations do not list the ref. /D/ and /E/ Honeywell bulletins revision date. The ref. /D/ and /E/ Honeywell bulletins have revision number 3, both dated February 28, 2007.

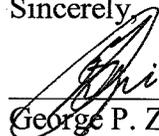
Continental Airlines is concerned that not enough attention has been given to the following:

- The ref. /C/ Boeing bulletin does not indicate the ref. /D/ and /E/ Honeywell bulletins revision date.
 - The ref. /C/ Boeing bulletin does not indicate the specific GFI relay part number that needs to be installed in the P91 and P92 panels.
 - The ref. /A/ NPRM, paragraph (f), note 2, has the wrong ref. /D/ and /E/ Honeywell bulletins revision date.
 - The ref. /D/ and /E/ Honeywell bulletins can be revised without FAA's knowledge or approval.
 - The ref. /D/ and /E/ Honeywell bulletins that indicating all different new P91 and P92 panel post modification configuration part numbers can be revised due to any other future modification of the internal components and wiring of these panels without FAA's knowledge or approval.
 - Any future repair or change to the P91 and P92 panels will require an AMOC request to the ref. /A/ NPRM or Airworthiness Directive (AD).
- The ref. /F/ TDG Aerospace STC, installs the UFI interrupters for the center tank override pumps as an AMOC to AD 2002-24-51 and has designed to provide electrical fault protection to the pumps and circuits. Continental Airlines recommends the following regarding the TDG Aerospace STC installation:
 - The UFI installation should be evaluated and considered, as an AMOC to the ref. /A/ NPRM, paragraphs (f) and (g) for the center tank override pumps, meeting or exceeding the level of safety provided by the ref. /C/ Boeing bulletin.
 - The ref. /A/ NPRM, should have a note indicating that airplanes modified by the ref./F/ TDG Aerospace STC, UFI installation for the center tank override pumps do not require GFI relay installations per the ref. /C/ Boeing bulletin in the P91 and P92 panels, positions R54 and R55.
 - Continental Airlines is concerned that not enough attention has been given that other than the ref. /C/ solution to the unsafe condition may exists in order to ensure that the specific detailed inspections are preserved for the long term operation of the CAL fleet. The proposed ruling, in effect, mandates inspections to be implemented for the protection against ignition sources on the 737NG fleet. However, other than some generic information found in the 737NG Maintenance Planning Data, ref. /B/ AWL there are should be other published "continuous airworthiness" maintenance documents like the ref. /G/ 737NG AMM supplement task available to show each specific requirement as detailed in the airplane's center tank pump override relay configuration.

In conclusion, Continental Airlines believes the current program, as provided in ref. /B/ AWL and proposed in the ref. /A/ NPRM, is not ready to be implemented. If mandated in its current ref. /A/ NPRM form, the program could not be incorporated by CAL in our 737NG fleet of aircraft since the majority of the fleet airplanes will be equipped with the TDG Aerospace STC UFI installation for the center override pump relays. CAL recommends that the FAA coordinate the noted concerns and possible changes with Boeing and TDG Aerospace prior to finalizing the verbiage of the rule.

If you have any questions or concerns regarding this request please contact me at 713-324-8976.

Sincerely,



George P. Zombanakis
Master Systems Engineering
Continental Airlines



Jerry Johanson
Senior Director Quality Assurance
Continental Airlines