



SAFAIR TECHNICAL

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File: wm036

December 10, 2008

Docket Management Facility
U.S. Department of Transportation 400 Seventh Street, SW, Nassif Building, Room PL-401
Washington, DC 20590-0001.

Subject: Docket FAA-2006-24281

Reference: 14 CFR Parts 25, 121, and 129 Ageing Aircraft Program; Widespread Fatigue Damage; Proposed Rule
Published in the Federal Register / Vol. 71, No. 74, April 18, 2006 Technical Document; FAA-2006-24281-068.
Notice of Public Meeting: FAA-2006-24281-066.

Safair have appointed Lynden Air Cargo to represent our interests at the WFD public meeting held on the 11, December 2008 in Seattle.

Safair agree with the 14 CFR Parts 25, 121, and 129 Ageing Aircraft Program; however disagree with the LOV of 50,000 flight hours as listed in the Technical Document. This puts a huge burden on us as an Operator as most of our aircraft in our fleet are over this threshold and some close to it. We believe that with an adequately maintained aircraft the LOV should be at least 75,000 flight cycles. We are of the opinion that the fatigue driver on this and similar airframes i.e. Boeing and Airbus is cycle base and not flight hour based, as has been accepted for other Type Certificated transport aircraft. Lockheeds standpoint that the life is hour limited is based on military developed data and not necessarily applicable to civilian type operations. The construction philosophy on this airframe allows for replacement of all major structural elements and as such, the airframe could theoretically, continue to an unlimited life, based on an amended and defined inspection programme.

Safair high time Fleet

S/N	Reg. #	TAT FH's	TAT FC's
4208	ZS-ORA	88,324	41,496
4248	ZS-ORB	73,506	37,681
4388	ZS-ORC	77,298	35,520
4565	ZS-RSG	52,144	26,509
4562	ZS-RSF	44,574	23,771
4475	ZS-RSC	39,108	22,783
4691	ZS-JIY	28,684	18,690
4695	ZS-JIZ	32,521	19,359
4673	EI-JIV	34,663	23,024

Kind Regards

Chris Carstens
Senior Vice President Engineering

cc. Ethan Bradford
Paul Willing
Alec Anderson

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