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Mark R. Rudo
Managing Director -- Technical Services

June 22, 2005

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U.S. Department of Transportation
Docket Management Facility,
Docket No. FAA-2005-20836
400 Seventh Street SW,
Nassif Building - Room PL-401
Washington, D.C. 20590

SUBJECT: Boeing AN-26 (PET) Insulation Blankets -- Notice of Proposed Rulemaking

REFERENCE: /A/ Airworthiness Directive (AD) Memo 05-AD-149
/B/ FAA NPRM 2005-NM-028-AD, Docket FAA-2005-20836 - 23

Dear Madam/Sir:

The Reference /A/ AD Memo advises that the FAA has proposed a Notice of Proposed Rulemaking applicable to US Airways' fleet of Boeing aircraft, delivered into service between July 1981 and December 1988. This proposed rule, if adopted, would require replacement of any insulation blanket constructed of the polyethyleneterephthalate, (PET) film, "AN-26", with insulation blankets compliant with FAR 25.856(a). Operators were requested to comment on this proposed rule. In response, US Airways offers the following:

- US Airways currently operates seventy-four (74) Boeing aircraft that would be affected by this new rule.
- Replacement of material removed from aircraft for any reason within six (6) months after effective date of AD.

As proposed, paragraph (h)(2) requires that after six months after the effective date of the proposed AD, any removal of insulation blankets identified as "AN-26", (or that insulation material of construction that cannot be specifically determined), be replaced with insulation compliant with FAR 25.856(a). However, approved methods of identifying "AN-26" material are not available to the operators at the time of proposed rulemaking, and would result in the removed insulation material requiring immediate replacement. This proposed action would incur a significant burden on immediate maintenance actions. US Airways feels that this requirement places undue operational hardship on operators. Insulation is routinely removed at numerous maintenance stations and would require additional stocking of material as well as training of people to identify and comply with this requirement. US Airways would prefer a scheduled replacement of material like current FAR 121.312 which states, that any replacement insulation on any airplane that is installed after September 2, 2005, meet the requirements of FAR 25.856(a). US Airways recommends that this six-month requirement be removed from the final rule.

- US Airways concurs with the FAA to develop criteria, in correlation with the adoption of the new insulation standard, (FAR 25.856(a)), that ensures in-service insulation material is deemed safe to remain in service; however, US Airways disagrees with the compliance plan as proposed in Reference /A/ Memo.

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Insulation replacement is a significant and costly maintenance action for the operators. The proposed compliance period of six (6) years from effective date of AD will result in a significant adjustment of current maintenance plans to ensure unhindered compliance. US Airways requests a ten-year compliance time to ensure that an approved method of identification for AN-26 material can be determined and approved, and/or permit maturity of service instructions that provide an alternative means of restoring flammability resistance, (compared to considerable replacement), of affected material.

The proposed rulemaking should also account for the cost impact and lessons learned while accomplishing previous ADs that similarly replaced Mylar insulation material. The proposed rulemaking should also realistically account for additional unscheduled time out-of-service that would be presented to the operators without methods of identification and/or mature service instructions as discussed. Insulation blankets are routinely removed for normal scheduled maintenance to perform inspections and other maintenance actions on systems and structure located behind insulation blankets. As currently proposed, this rulemaking would significantly extend the scheduled maintenance time required, due to the fabrication of compliant insulation material and subsequent replacement of suspected insulation material, necessitated by the inability to currently identify AN-26 material.

US Airways recommends that the proposed rule be withdrawn and reissued when approved methods of identification and mature service instructions are available, or issue a supplemental rule extending the compliance period to account for the noted operator issues.

US Airways appreciates the opportunity to comment on this proposed rule.

Sincerely,



Mark R. Rudo, Managing Director
Technical Services

MRR/sd/agb