Appendix F

Old STCs

727/737

Advantages:
1) Provides a “phased-in” approach rather than a several years long compliance time with no requirements for interim action.
2) Provides interim inspection requirements.
3) AD Note 7 provides detailed description of plan requirements (this has proved out in plans submitted to SACO).
4) Includes consideration of SSIs created and affected.
5) Includes definition of SSIs Created.
6) Phased-in approach spreads out ACO manpower over 48 months compliance time rather than at the end of the compliance time.

Disadvantages:
1) Paragraph (d)(1) is unused and constitutes compliance with (d)(2).
2) Approval of accomplishment plans takes a lot of ACO manpower; See note 6 in pluses above (Provides discussion that justifies phase in process) (No Recommendation).
3) Paragraph (d)(2) is complex and difficult to understand.
4) Compliance time for “old” STCs is inconsistent with that for “old” repairs or non-STC design changes. “Old” repairs and non-STC design changes are allowed to go to Nth. (STCs had ACO review, repairs and non-STC design changes may not have had ACO review).
5) Does not include definition of “SSI created.”

MD-80

Advantages:
1) 5 years compliance time is consistent with other aging airplane initiatives.
2) 5 years compliance time is consistent between old STCs and repairs and non-STC design changes.

Disadvantages:
1) 5 year compliance time does not include requirements for interim plan development or interim visual inspection.
2) Does not include consideration of PSEs created.

General Comments:
The phased-in process requires interim action for old STCs.
Old Repairs and Non-STC Design Changes

727/737

Advantages:
1) Gives operators time to comply.
2) Addresses SSIs created.

Disadvantages:
1) Compliance time could be very long- until Nth. (Compliance time is inconsistent with that for old STCs, is there sufficient justification that old STCs are more critical?)
2) Compliance requirement is tied to cycles rather than calendar. Justification for compliance time related to cycle requirement of original "well" structure is weak.
3) No provision for 2 or 3-step DTA evaluation process after repair evaluation.
4) Since repair assessment rule was not yet final, RAG is not identified as acceptable method of compliance in the AD.

MD-80

Advantages:
1) 5 years compliance time is consistent with other aging airplane initiatives.
2) Calendar related compliance time is consistent with other requirements of the AD. (i.e. for old STCs and new STCs and repairs).
3) Provisions for 3 step DTA evaluation process.
4) Note 6 recognizes the RAG as an AMOC for paragraph. c&d for fuselage repairs.

Disadvantages:
1) Does not include consideration of PSEs created.
2) No description of what is expected in the revision to the maintenance/inspection program.
3) No phased in approach may result in extensive ACO worked at the end of the compliance time.
New Repairs, STCs and other design changes

727/737

Advantages:
1) Generic AMOC to AD accepts 2-step DTA evaluation process.

Disadvantages:
1) 12 months is short compliance time, especially considering these are new repairs at new design philosophy.
2) This compliance time is inconsistent with the compliance time for old repairs (i.e. Nth + 12 months) (Use justification of 727 preamble and LAACO policy; No Recommendation).
3) AD has no provision for 2-step DTA evaluation process (Done via AMOC 99-120S-370).
4) Does not recognize the RAG as an AMOC for fuselage repairs.

MD-80

Advantages:
1) Note 5 defines the 3-step approval process.
2) 18 months maybe a more reasonable compliance time than 12 months
3) Note 6 recognizes the RAG as an AMOC for paragraph c and d for fuselage repairs.

Disadvantages:
1) Does not address “PSEs created by repair or modification.