

March 23, 2007

Craig Bolt  
Assistant Chair  
Transport Airplane and Engine Issues  
Aviation Rulemaking Advisory Committee  
Pratt & Whitney  
400 Main Street  
East Hartford Connecticut 06108

RE: ARAC; Transport Airplane and Engine Issues – New Task FR Doc. 04-10816,  
Dated May 13, 2004, Phase 1, Task 3 Close-out.

Dear Mr. Bolt

On behalf of the Airworthiness Assurance Working Group (AAWG), we the undersigned are pleased to submit a Final Report concerning the referenced task for your consideration. The Tasking requested the AAWG to consider how best to comply with the requirements set forth in 14 CFR 121.370a and 129.16, the Aging Airplane Safety Final Rule. Specifically this task element asked the AAWG to consider how best to enable part 121 and 129 certificate holders of airplanes with a maximum gross take-off weight of greater than 75,000 pounds to assess the WFD characteristics of structural repairs, alterations, and modifications as recommended in a previous ARAC tasking. In December 2005, the AAWG made certain recommendations for this task to the TAEIG that required additional development. The contents of the attached report contain the conclusions and recommendations of this activity.

This final report is being submitted as a full consensus position of the AAWG; there are no dissenting opinions.

The final report for task 3 presents a separate advisory circular (AC) that provides direction to the TCH and Operator in determining maintenance programs for baseline fatigue critical structure for widespread fatigue damage (WFD) and the means to determine a Limit of Validity (LOV) of the maintenance program. In addition, this report outlines the procedures to be used for the consideration of widespread fatigue damage that might develop in repairs, alterations and modifications (RAMs) to baseline structure. This report completes Task 3.

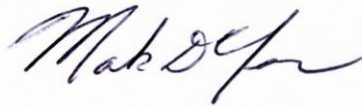
The AC contained in Appendix C conforms to FAA policy delineated in PS-ANM110-7-12-2005, Policy Statement, "Safety – A Shared Responsibility - New Direction for Addressing Airworthiness Issues for Transport Airplanes," issued July 6, 2005, effective July 12, 2005. The positions developed and presented in this report have evolved over a period of time and are based on reasoned discussions that occurred during the Tasking. However, Rulemaking is underway and guidance material is being published

even as these positions are being submitted. In light of this very dynamic situation, the conclusions and recommendations made in this report must be considered as based on the best available information. It is expected that the FAA will consider the information contained herein in developing the final guidance on this subject. Should the FAA make changes to their anticipated course of action, or if other information comes to light, specific recommendations in this report may no longer be the most appropriate course. To help continue in moving this effort forward, the AAWG is available to discuss any of these positions that the FAA may find unclear or confusing, or based on outdated assumptions.

The AAWG wishes to thank the FAA and ARAC; TAEIG for allowing us to participate in this important rule making event.



Rao Varanasi  
Co-Chair AAWG  
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Mark Yerger  
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