

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 note 6 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.