

**AGING TRANSPORT SYSTEMS RULEMAKING
ADVISORY COMMITTEE
Draft Meeting Minutes**

Date: March 13, 2001
Time: 8:00 a.m.
Place: Boeing Company
Roslyn, Virginia

Administrative

Mr. Kent Hollinger, the Aging Transport Systems Rulemaking Advisory Committee (ATSRAC) Chair, called the meeting to order at 8:20 a.m. Mr. Charles Huber, the ATSRAC Executive Director, read the advisory committee briefing statement, after which Mr. Hollinger began the introduction of attendees and announced that Ms. Shirley Stroman would be taking over the responsibility for coordinating ATSRAC functions, including taking the minutes, from Ms. Brenda Courtney.

Mr. Hollinger then reviewed the agenda, indicating that no printed copy was done since there was only one item under discussion—the new taskings. In reference to the day's agenda, Mr. Hollinger announced that Mr. Huber would do a high-level overview (Handout 1) of the taskings. Then, Mr. Huber would lead the group in a discussion of each task and the associated comments from Boeing and Airbus, which he had incorporated into the initial draft (Handout 2). Mr. Hollinger added that the draft with the incorporated comments had been distributed to Committee members prior to the meeting. Mr. Hollinger cautioned the group that during their discussion, they should focus on the intent of the taskings and whether the Committee would accept them as opposed to focusing on wordsmithing.

Following the review of the agenda, Mr. Hollinger introduced Mr. Mike Nancarrow (Boeing) who reviewed "housekeeping" items, then announced his retirement at the end of the month as the Boeing representative to ATSRAC. Mr. Nancarrow indicated that his replacement would be Mr. Wayne Maxey. Following Mr. Nancarrow's announcement, Mr. Hollinger presented Mr. Nancarrow with a certificate of recognition and appreciation for his dedication and service to ATSRAC. Following the presentation, Mr. Huber began the general overview of the taskings (Handout 1).

Overview of Tasks 1 to 9

Mr. Huber began his general overview of the taskings (Handout 1) by providing background information discussed at the January meeting. Namely, he discussed that the new taskings under EAPAS are focused on accomplishing short-term, near-term, and long-term objectives, with ATSRAC's work falling under the long-term objectives. The philosophy of EAPAS, he continued, is to encourage voluntary compliance given that the rulemaking process is lengthy. Following these remarks, Mr. Huber began the tasking overview by briefly addressing tasks 1 to 5 to say that the final reports will close out the recommendations to the FAA.

Mr. Huber continued his discussion with introductory remarks to tasks 6 to 9 where he stated that he had received a number of comments on the taskings that he had incorporated into the official tasking statements. He added that he would review the statements and comments with the group as he discussed the specific tasks. He went on to say that the original November 24, 2001 date in the EAPAS schedule for submission of reports to the FAA on the second set of taskings would be extended to coincide with the date when work on the taskings would begin. Mr. Huber continued his discussion by reviewing tasks 6-9 per the outline in Handout 1:

TASK 6

Task 6 covers the wire system certification requirements and comes under the harmonization working group (HWG) format. It involves reorganizing part 25 to include all wiring systems

certification requirements in one section, determining new requirements, and identifying 1309 compliance requirements. The associated products include part 25 rulemaking and a related AC.

TASK 7

The intent of task 7 is to develop a standard format and content for the SWPM, not necessarily to dictate specific content material. The product as proposed would adhere to ATA specification 100. This task does not involve rulemaking under current ATSRAC procedures, so the Committee is not held to the harmonization working group format. However, the same amount of participation is encouraged from both the U.S. and European members.

TASK 8

Task 8 is the training component, which falls under the HWG format. The essential purpose is to develop a wiring system training program and recurrent SWPM training. The related products would be a number of operational rules with ACs that define the training program.

TASK 9

Task 9 involves enhanced maintenance criteria and falls under the HWG format. This task includes the development of the wire systems maintenance program, which is largely recommendations from task 3 that cover SEDLP maintenance and EZAP. Also, the ICAW was moved to this task. This will be a large task whose products will be an operational rule and associated AC that are consistent with the training rule and related AC, an EZAP SFAR and AC, and review of changes to ICAW Appendix H (part 25.1529).

Following discussion of task 9, Mr. Patrick Glapa (Airbus Industrie) raised a question concerning whether Mr. Frederick Sobeck (FAA) had already formed a working group to begin work on the maintenance AC. In response, Mr. Sobeck indicated that he had, in fact, formed a working group with members from tasks 1, 2, and 3 working groups to help the FAA develop a generic maintenance AC. Mr. Sobeck indicated that he wanted to get a "jump start" on the AC, realizing that it would take time for the Committee to modify and approve the taskings. He continued his response by explaining that it would help facilitate the rulemaking process to get an early start on developing the format for the AC.

In a follow-up comment, Mr. Glapa expressed concern that if the ATSRAC working group learned something new as it worked on the tasking, the already formed working group wouldn't have the benefit of that information. In response, Mr. Sobeck indicated that the work done by working group 3 would be the basis for the AC in that what's in the working group's document would be incorporated into the AC.

After Mr. Sobeck's comment, Mr. Hollinger noted that he had not previously heard of the working group under discussion and expressed concern that duplication of effort could result from the FAA's working group and the ATSRAC working group formed to address task 9. He also indicated that he had already run into problems obtaining co-chairs for the ATSRAC working group members and suspected this was because many of them were already committed to working on the FAA's working group. He went on to say that due to the time requirements of these commitments and their regular jobs, it would be especially difficult to recruit co-chairs for the ATSRAC tasks. Mr. Sobeck responded that the intent was not to duplicate, but to take advantage of what had already been recommended to the FAA in the report from working group 3 and 5 to develop the AC to accompany the rulemaking. He reiterated that the FAA working group's efforts were not duplicative, but were intended to prevent delay as ATSRAC review and approve the taskings.

After Mr. Hollinger expressed additional concerns about the purpose of the FAA's working group, Mr. Huber reiterated Mr. Sobeck's comments by saying that the effort was intended to support the taskings and get a head start, not to duplicate efforts of the ATSRAC working groups. Following Mr. Huber's remarks, Mr. Sobeck added that the FAA would like the Committee to sanction its working group and allow the group to proceed with its work. Mr. Sobeck continued by saying that

he had selected individuals from the original working groups so as to apply that body of knowledge to the development of the maintenance AC.

Following Mr. Sobeck's comments, Mr. Hollinger indicated that while the Committee was not now at the point of selecting the ATSRAC working group membership, when it did get to that point, names could be submitted from the FAA's working group so that the ATSRAC working group could benefit from the current working group's resources. Mr. Sobeck remarked that he had also asked the JAA and Transport Canada to participate on the FAA's working group. Mr. Hollinger then offered the assessment that based on the discussion thus far the intent of the FAA's working group appeared to be that of making the FAA's working group part of the ATSRAC effort by reformatting it in the harmonized format with co-chairs, etc., so that there won't be duplication of resources. Mr. Sobeck responded that Mr. Hollinger's assessment was correct.

Following this exchange, Mr. Robert Robeson (AIA) questioned which CFR parts were being considered in formulating the operational rule and AC. Mr. Sobeck responded that parts 91,121,125,129,and 145 would be included, in addition to an SFAR component for part 21. Mr. Sobeck also stated that all available data, including what's available from manufacturers, would be considered in developing the rulemaking project.

After Mr. Sobeck's comments, a discussion ensued that the assumption can be made that the condition of wiring in new airplanes will be similar to that in 20-year-old airplanes even with advances in installation practices. As a result, lessons can be learned from intrusive and nonintrusive inspections that better maintenance can be done on aircraft today to increase the safety of wiring systems. The discussion continued with comments about zonal inspections. Mr. Sobeck indicated that the task 3 working group had developed enhanced zonal procedures to look at zones of aircraft, irrespective of the aircraft's age, and the working group had developed new logic and procedures that the FAA's working group could use to develop the maintenance AC that would compliment the operations rule. Mr. Hollinger added that he believed the gist of the discussion was that the Committee is not going to limit the working groups in their tasking to only look at older airplanes. This discussion continued with a comment from Mr. Victor Card (JAA) that input from JAA could help in harmonizing the intent of the taskings. This was followed by additional discussion about how to approach zonal inspections for old versus new airplanes. Mr. Hollinger decided to end the discussion by commenting that this was an area that shouldn't be decided now but should be left to the working group to consider and to recommend an appropriate approach.

A question followed concerning task 7 of how regulation would ensure that industry would use the product from task 7. Mr. Sobeck responded that it was premature to say what regulation might require in this area. Following additional discussion, Mr. Hollinger asked the group to hold their comments about the tasks until Mr. Huber began the detailed discussion.

Several questions from Mr. Ed Block followed wherein he asked (1) what product had resulted from the FAA's working group headed by Mr. Sobeck? (2) under what procedures was the working group operating? and (3) how would the Committee ensure that industry would follow the (maintenance) AC since there are current ACs that industry does not now follow? Mr. Huber addressed Mr. Block's questions. In answer to question one, Mr. Huber answered that there were no products. In answer to question two, Mr. Huber responded that under existing operating procedures, it was entirely appropriate for Mr. Sobeck to form a working group to look at developing an AC. In answer to question three, Mr. Huber responded that no one is bound to follow an AC, and that is why the products for task 9 include both an Ops AC and Ops rule. The Ops rule, Mr. Huber commented, requires an enhanced maintenance systems program and the AC will help to meet this requirement. He continued with the comment that the AC provides a benchmark and if the working group determines that there is only one way to meet the proposed rule, that should be included in the rulemaking language.

Following this comment, a participant asked if other than part 25 airplanes would be included in the rulemaking. Mr. Huber responded that data had only been collected, thus far, for part 25 airplanes and before other categories, like small transports or business jets, could be included, data on them had to be collected.

Mr. Hollinger then asked Mr. Huber to continue his discussion by briefly summarizing the remaining slides in his presentation and holding detailed discussion of each task until later in the day. Mr. Huber continued with a discussion about the formation of ATSRAC harmonization working groups. In response to Mr. Huber's comments, Mr. Card commented that the best approach to harmonization is to harmonize based on intent since there is no direct parallel between the operational parts of the JAR and FAR. Mr. Sobeck agreed and expressed that this same approach had been taken with the Aging Aircraft Safety rule, which is devoted to aircraft structure.

Following the completion of Mr. Huber's overview, Mr. Hollinger indicated that Mr. Robert Robeson would make a presentation on the taskings (Handout 3) of comments from industry. Mr. Hollinger also asked for any additional comments of a "high-level nature" that the group may have on Mr. Huber's presentation.

Mr. Robeson began his presentation by stating that he had met with individuals from industry to form some general recommendations regarding the taskings. He stated that based on the meeting, there was an indication that the ATSRAC taskings had industry's full support; however, there was concern that valuable time and resources might not be used to their best advantage unless the taskings were clearly stated up front. Mr. Robeson stressed that the recommendations that came out of his meeting were focused on addressing this concern. With that, he reviewed the items covered in Handout 3, which included a recommendation that the FAA form a working group to clarify the tasking statements and have the Committee focus today on accepting the intent of the taskings. Following Mr. Robeson's remarks, Mr. Huber expressed his support to have ATSRAC form an ad hoc group to clarify the taskings.

Mr. Hollinger then asked for comments on Mr. Robeson's recommendation about forming a small group to review and clarify the tasking statements. Mr. Glapa commented that the Committee had used ad hoc groups in the past like the small group that developed the definitions for aging systems. A discussion then ensued about the short timeframe for an ad hoc group to do its work, submit its proposal to ATSRAC, and get approval. Before a decision was made on the proposal to form the ad hoc group, a discussion began where some Committee members expressed that they preferred to delegate the ad hoc work to someone else in their organization who possessed the technical expertise in the subject areas under consideration. As a result of this discussion, a question was posed as to whether members of the ad hoc group had to be comprised of Committee members or whether they could be from industry.

In response to this question, Ms. Brenda Courtney indicated that, according to the ATSRAC Charter, the membership of the Committee was listed by the name of the organization, not the individual Committee member. Therefore, a person from the organization other than the Committee member could sit on the ad hoc working group. Mr. Huber followed by stating that he wanted to get legal clarification on this matter before a final decision was made on the make-up of the Committee's ad hoc working group. The discussion then moved to comments regarding the need to select working group chairs at today's meeting so that these individuals could be involved in the ad hoc group's work early on.

Following this discussion, the Committee came to a consensus on the following:

- Approval to form an ad hoc working group to clarify the tasking statements. Mr. Huber would be the oversight person for the group, which would convene on March 28, 2001 at the FAA in Seattle to complete its work and provide the Committee Chair, Mr. Hollinger, with its

proposal. Mr. Hollinger would submit the draft to the full Committee for review and final approval.

- Approval for the Committee to spend the remainder of the day defining the intent of the taskings and preparing guidance for the ad hoc group to follow. The Committee Vice-chair, Mr. Shaw would take notes on the guidance and intent as the Committee reviewed each task, and he would provide the ad hoc group members with this information from which they would do their work.
- Mr. Hollinger would solicit volunteer organizations to provide working group co-chairs for tasks 6 to 9 as the Committee reviewed each task, then within the next few days, he and Mr. Huber would contact the volunteer organizations to obtain the names of the selected individuals. The ad hoc group would be made up of these individuals and any others put forth by the volunteer organizations.

Following these decisions, Mr. Hollinger called a break, after which the Committee reconvened to discuss the taskings. Before this discussion began, a question was posed about whether volunteers other than co-chairs would be solicited to participate on the ad hoc group. In response, Mr. Hollinger asked for such volunteers. One person, Mr. Dave Allen (SAE), volunteered.

Mr. Card followed with a question concerning the nature of the document the ad hoc group would prepare. In reference to the harmonization of the working groups, Mr. Card asked if the ad hoc group's draft would be a straight drafting of the taskings or would the group create the terms or reference. Mr. Huber responded that it would be more efficient for the group to create the terms of reference. Mr. Card followed by asking if the co-chairs the group just discussed meant American co-chairs. He went on to say that given the March 28 timeframe for the ad hoc group meeting, there was not enough time to appoint European co-chairs. Mr. Hollinger responded that it would be desirable to have European representation. Mr. Huber asked if there was an alternative method to get European input. Mr. Card responded that the procedure of having the terms of reference drafted by an ad hoc group was unusual since they are normally drafted by one person, then the harmonization management team makes sure the terms of reference are acceptable to all parties. Now, he continued, the focus is to first try to make sure the terms of reference are acceptable before they go to the harmonization management team. Mr. Card continued his comments by saying that while he agreed with the concept of having the ad hoc group clarify the taskings, the March 28 date to meet would not allow participation by European co-chairs. Following these comments, Mr. Hollinger stated that every effort would be made to include European representatives via Airbus and other means. With that, Mr. Hollinger moved the group to discussion of task 6.

Mr. Huber began the discussion by continuing to review the slides in Handout 2, specifically page 4. Following discussion of pages 4 and 5, Mr. Donald Collier (ATA) asked about whether the FAA's study over the next 12 months of certification issues would duplicate what's covered in task 6, and if there is no duplication, how will the study be integrated into work on task 6. Ms. Vi Lipski (FAA) responded that the FAA Air Transport Directorate was leading the effort on the certification study, which may not be correlated with the ATSRAC taskings. She continued by commenting that the Directorate was looking at the life cycle of the certification process and how it affects maintenance and operations. However, since there was no way to tell what the study results would be, it was difficult to tell if there would be any tie back to the present effort.

Following Ms. Lipski's remarks, Mr. Card commented that the JAA supported the part 25 rule and AC and wanted to move forward with this and with identifying 1309 compliance requirements. However, he noted that, because part 25 rules would apply to safety improvements well into the future, there was no pressure to get retrospective rules in place. Mr. Card continued his remarks by saying that Mr. Huber had mentioned that the task 6 working group would be made up of members from the ARAC Electrical System Harmonization Working Group, in addition to individuals with wiring-related and electrical systems experience. Therefore, Mr. Card

questioned, why task 6 should be done under ATSRAC and not ARAC, whose membership has the experience in this area.

Mr. Huber responded by saying that he felt the task was appropriately placed with ATSRAC because the Committee, having much fewer tasks than ARAC, could focus more quickly on wire system issues. Another participant expressed agreement with Mr. Huber's remarks. Following this discussion, Mr. Block questioned why the FAA was not considering wire performance testing, whereupon Mr. Huber replied that the FAA was considering this area under the EAPAS program, but it was not a part of the ATSRAC taskings.

Mr. Hollinger then commented that Mr. Huber should continue his presentation so that the group could learn more about what was and was not a part of the taskings, whereupon Mr. Huber stated it was a good time to review the actual tasking statement draft (Handout 2). Mr. Hollinger asked that the group take the draft paragraph-by-paragraph and comment on its acceptance of each, whereupon the discussion ensued, which detailed additional revisions to the draft text and provided guidance to the ad hoc group to fine tune the taskings. Mr. James Shaw recorded the revisions and instructions to the ad hoc group within the relevant text of the draft taskings.

The following is a list of decisions included in the above discussion that the Committee voted on:

- Mr. Card asked if NTSB recommendations should be mentioned in task 6, under paragraph (6)(a)(2) of Handout 2, along with ARAC and ATSRAC recommendations. Following Mr. Card's question, a discussion ensued that included the following comments: The OEMs have already reviewed NTSB recommendations and have taken them under consideration to enhance safety with respect to fuel tanks, for example, so there is no need to consider this again. NTSB recommendations have already been considered in identifying the flaws in the regulations, and now, this current task is being presented to correct those flaws. Mr. Hollinger expressed concern that the Committee had not yet reviewed these recommendations, so it was not entirely appropriate to include them as a part of what should be reviewed here. Mr. Sobeck commented that the FAA takes NTSB recommendations very seriously and he wanted to assure the Committee that FAA has addressed or is now addressing all NTSB recommendations with reference to wiring or the TWA-800-related recommendations.

DECISION: The Committee agreed by a vote of 8 to 6 not to include NTSB recommendations under this paragraph.

- The Committee discussed whether in task 6 to delete paragraphs (2)(i) and (2)(ii) of Handout 2.

DECISION: The consensus was to leave these paragraphs in the draft.

- The Committee discussed that task 6b--Instructions for Continued Airworthiness--had been moved to task 9.
- With respect to task 7 of Handout 2, the Committee discussed deleting the third sentence, which reads "It is expected that manufacturers will develop or convert..." (See the last paragraph of item number 1, task 7 that begins with "The structure shall also allow inclusion of wiring repair...")

DECISION: The consensus was to delete the sentence.

- Beginning with item 2, the second paragraph of task 7 in Handout 2, the Committee discussed amending this section to say that the working group should address what to do when there is an accumulation of contaminants, etc.

DECISION: In an 8 to 6 vote, the Committee agreed to amend this section as discussed.

- The Committee discussed the bolded sub-headings under task 7, items 2 and 3 of Handout 2, as to whether to keep these sections and advise the ad hoc group to add wording that say "consider" this or that solution as opposed to stating the solution. The Committee also discussed moving item 3 to task 8.

DECISION: The Committee voted 12 to 2 to advise the ad hoc group to revise the sections to state "consider," etc. The Committee also agreed to move item 3 to task 8.

The following is the list of organizations that volunteered to supply working group co-chairs:

Organizations

Task 6: Boeing and Airbus

Task 7: SAE, Boeing, and Airbus

Task 8: ATA (FAA will solicit other volunteers.)

Task 9: Northwest Airlines, possibly Air Canada, and others to be solicited

Following the detailed discussion of the taskings, Mr. Hollinger stated that it was important to remind the ad hoc group to make sure that all the products mentioned in Mr. Huber's slide presentation (Handout 1) are covered in their draft. He also indicated that if Committee members wanted a copy of Mr. Shaw's notes to the Ad Hoc group, they should provide him with a diskette to download that information.

Following this comment, a discussion ensued about the use of the term "safety" in the taskings and what it implied. Mr. Mike Nancarrow was concerned that the message sent by this implication was that the airlines are not already safe. Mr. Block commented that he believed there was indeed a safety issue as described in the Intrusive Inspection Report. Following additional comments about this issue and suggestions to revise the wording to better reflect that the intent is to "enhance" an already safe airline industry, Mr. Hollinger stated that Mr. Huber would take all comments on the topic under advisement.

Before adjourning the meeting, Mr. Hollinger reminded the group that the next meeting would be April 25-26 in the Bessie Coleman Conference Center at the FAA headquarters in Washington, D.C. He added that by that time, the ad hoc committee would have met and the working group chairs would have been chosen. As a result, he noted, there might only be a need for a one-day meeting. He continued his comments by saying that, at April's meeting, he would like to see some initial plans from the working group chairs on how they would proceed. Also, by the next meeting, he stated that he would like to have January's minutes prepared. However, the minutes from today's meeting would probably not be ready. He added that today's meeting had been very different and difficult, but he believed everyone's voice had been heard and their concerns discussed. Following these comments, he thanked everyone for coming and adjourned the meeting.

Meeting Attendees: See sign-in sheet (Handout 4).

Adjournment

The meeting adjourned at 5:10 p.m. on March 13, 2001.

Kent Hollinger

Chair

Approved: