

**AGING TRANSPORT SYSTEMS RULEMAKING
ADVISORY COMMITTEE
MEETING MINUTES**

Date: April 24-25, 2002
Time: 9:00 a.m. MST
Place: Honeywell
Phoenix, AZ

DAY ONE

Administrative

Mr. Kent Hollinger, the Aging Transport Systems Rulemaking Advisory Committee (ATSRAC) Chair, called the meeting to order at 9:00 a.m., after which Mr. Charles Huber, the ATSRAC Executive Director, read the advisory committee briefing statement. After Mr. Huber's statement, Mr. Hollinger discussed that the direction of the current meeting would be to cover any major issues the working groups may have so that they could address them over the next 3 months and before the July meeting. This means that, except for minor editorial changes, the working groups should not need to make changes (e.g., a change in focus) to their final reports after the July meeting. Mr. Hollinger then thanked Honeywell for hosting the meeting. His remarks were followed by introductions and review of agenda items (Handout 1). Mr. Hollinger noted that Mr. Jim Shaw (ATSRAC vice-chair) would Chair the meeting on tomorrow afternoon as he had a prior commitment.

Approval of January 2002 Minutes (Handout 2)

Mr. Hollinger opened the floor for comments on the January 2002 minutes. After a request for a minor clarification, the Committee unanimously approved the minutes with the requested change.

Future Meetings

Mr. Hollinger noted that the Committee had previously agreed to a three-day meeting in July, and had discussed that there may not be a need for a full two-day October 2002 meeting to have Working Group 10 make its draft final report. He added that a decision about the October meeting could be made at the July meeting. He then asked for discussion about a possible location for July's meeting. Mr. Huber recommended that the July meeting be held in Washington, DC., and he added that while Working Group 10 may not be giving their final report at the July meeting, he would expect that the group would have completed a sufficient amount of work to give the Committee a good idea of the group's progress since the information will be used to help develop the rulemaking package. Following Mr. Huber's comments, the Committee agreed to hold the July meeting in DC. Mr. Hollinger then asked for discussion on a location for the October meeting, whereby Mr. Sedeghi stated that members of Working Group 10 had discussed having one of the small aircraft manufacturers host an ATSRAC meeting. Mr. Hollinger asked that a small aircraft manufacturer representative on Working Group 10, who may want to host a meeting, get approval from their management and send him a formal invitation via e-mail.

Wire Separation from the Pilot's Perspective (Handout 3)

Mr. Jim Shaw provided the presentation in Handout 3, which focused on accidents and incidences caused by improper wire separation.

Discussion

After a comment from the floor regarding wire bundles, Mr. Huber stated that part of Working Group 6's tasks involve taking the focus off individual wires as part of a system and trying to look at wires in the context of their airplane-level effect. After additional discussion, Mr. Pappas indicated that the FAA's Technical Center will be conducting a study of wire separation and would be soliciting bids to support the study.

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Following a brief resumption of Mr. Shaw's presentation, a discussion ensued centering around the examples Mr. Shaw had given in his presentation. Mr. Patrick Glapa (Airbus) voiced the following comment: "The examples presented by Jim Shaw did not concern the Airbus product as Airbus was using the wiring segregation and separation rules to design their aircraft. Jim's presentation could lead the public to think that the lack of precaution regarding wiring segregation and separation concern all aircraft manufacturers, which is definitely not the case for Airbus."

Intrusive Inspection Recommendations Status (Handout 4a, 4b)

Mr. Mike Nancarrow (ATSRAC Integration Leader) began his presentation by asking Mr. Sedeghi (FAA) to give an overview of the FAA's resolution process for the 250-plus actions from chapter 7 of the *Intrusive Inspection Report*. He then indicated that he would follow-up with a detailed discussion of those items that affect the working groups. Mr. Sedeghi noted that the FAA had reviewed all the recommendations in chapter 7 of the Intrusive Inspection Report and that all actions would be resolved. While the individual actions are assigned to owner(s), the FAA has ultimate responsibility for closure of all recommendations. Mr. Sedeghi added that the FAA expects that consensus would be reached as to how to address each of the intrusive inspection recommendations. He then discussed Handout 4a, which includes a status of the ATSRAC's review of and comment on the Action Plan. He indicated that resolution is expected of all actions by the July 2002 ATSRAC meeting and that 15 P1 actions (i.e., priority 1 actions) would be resolved by the end of today's meeting. He further indicated that the FAA would publish a final report in September 2002, encompassing the resolution of each action.

Mr. Nancarrow began his presentation (Handout 4b), which included the status of each of the P1 actions and a discussion about the comments received on these actions. He noted that if time permitted, he would begin review of the P2 and P3 actions.

Discussion

Following Mr. Nancarrow's remarks, a lengthy discussion ensued concerning heat shields. Mr. Kirk Thornburg (Northwest Airlines) indicated that there should be design criteria available for heat shields, showing where they should be placed. He also noted that having such criteria would make maintenance an easier process. Mr. Huber stated that Mr. Thornburg's comments were more relevant to documentation that the OEMs would provide. In addition, he said that the rule would not include such information, but would contain a requirement that wires be protected from heat sources. The corresponding Advisory Circular would state that one way to provide such protection is with a heat shield. After additional discussion, Mr. Nancarrow indicated that the issue would be discussed later, and he asked the group to hold their comments until later in the presentation.

Following Mr. Nancarrow's resumption of his presentation and remarks about item 2a3 of Handout 4b, another discussion ensued about flammable materials. Mr. Shaw noted the difficulty in determining what is considered flammable materials, and he said he did not believe the owner comments on item 2a3 had adequately addressed this issue. He added that no matter how it's done, the EZAP, to be valid, should take into account all flammable materials in a zone. Therefore, the FAA should develop a list of flammable materials to include in the EZAP logic. Mr. Huber commented that the FAA's position on this issue remained the same as stated in the information recently sent to the Committee. He added that he wanted to reiterate that flammable does not mean that a material won't burn; it means it won't burn at a certain temperature. Even materials that have passed the new flammability standards may burn because of a particular ignition source. While this issue is not addressed in the EZAP, the FAA does have a number of programs, mainly through its Technical Center that address this issue. He added that based on the results from these programs, the FAA may, at a later time, add a flammability list to the EZAP logic.

Mr. Hollinger summarized the discussion noting that the present EZAP logic contains a box with the statement: "If flammable materials are present..." But, the current guidance on how to respond to the information in the box only relates to contamination. However, this guidance

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material could be updated in the future to include items other than contamination. After additional discussion about whether it was appropriate to ask the FAA to task ATSRAC with the flammability issue, Mr. Hollinger asked the Committee if they were in agreement with the FAA's current position on the issue, or would they rather request that the FAA task them with the issue. Mr. Thornburg responded that he agreed with the FAA's position with the stipulation that once the FAA develops flammability criteria, they would incorporate it into the EZAP logic. Mr. Huber stated that he could not commit to doing that because the FAA may find a better way to handle the issue; however, he acknowledged that he understood the intent for including flammability criteria in the EZAP logic. Committee members had no further comments on the topic. The outcome of the discussion was to have the FAA move forward with its research and development efforts and upon completion of these efforts, determine how best to provide guidance on flammability materials.

Intrusive Inspection Recommendations Status (Continued)

Mr. Nancarrow continued his presentation of the P1 actions, requesting further comment and/or agreement with owner responses to comments received on the actions. The goal of the process, he stated, was to ensure that if there are major directional changes in the working groups, they are addressed now so that progress toward completion of final reports won't be compromised.

Discussion

The group discussed that it was difficult to determine if they agreed with the comments without benefit of hearing the working groups' full reports that would be given later in the meeting. So, Mr. Nancarrow modified the approach to dispensing with the owner comments by asking for agreement and/or comments from attendees with the caveat that their response may change once the working groups gave their reports.

Mr. Huber indicated that in areas of the *Intrusive Inspection Recommendations (IIR)* that refer to cleaning procedures, references to the Research and Development Program should be noted. He added that he would assist Mr. Nancarrow in adding these references to the IIR. In the discussion of the OEMs' comments on item 3b1 of the P1 actions, an attendee noted that OEMs don't understand the reference to SWR-111 and MD11, nor do they understand what they are responsible for. Mr. Shaw responded that there was flammable material that ignited in SWR-111 that was adjacent to wires, so that was the reason for the reference. Mr. Shaw suggested inserting this explanation in the comments for clarification, and he agreed to e-mail Mr. Nancarrow the wording for the explanation.

The discussion continued with comments about the availability of testing programs to supplement visual inspections. The resolution was to have Working Group 9 include in their recommendations to the FAA that as validation reports become available, the FAA would disseminate these reports to industry to include in the EZAP logic. In addition, this resolution should be noted on the IIR.

Intrusive Inspection Recommendations Status (Continued)

Mr. Nancarrow continued his presentation of the P1 items. After completing discussion of these items, he indicated that within the next few weeks, he would incorporate the comments into the IIR document and re-issue it to Committee members. He then asked for agreement that the working groups had adequately addressed the items in the IIR. This was followed by Mr. Hollinger's request for agreement/disagreement with the direction the working groups were taking based on Mr. Nancarrow's presentation. The Committee agreed with the working groups' direction with the caveat that their position may change after hearing the detailed reports. Mr. Hollinger proposed, and the Committee agreed, that in the interest of time, Mr. Nancarrow should skip the P2 and P3 items. In addition, Mr. Sedeghi would forward for the Committee's review a copy of the P2 items as soon as possible and a copy of the P3 items by May 30th.

Working Group 10 Status Update (Handout 5)

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Working Group 10's report was moved to the first day of the ATSRAC meeting to accommodate the schedule. Mr. Bill Schultz discussed the progress of the working group as indicated in Handout 5. He noted that one Co-Chair position remained opened, and he would submit a resume for George Miller of Pizza Hut to become a member. There was also discussion about the lack of JAA's participation in the working group. Mr. Vic Card (JAA) agreed to contact the DGAC/France for participation in the group's inspections and both he and Tony Heather (JAA) would act as liaisons to forward the working group's products to the JAA for review and comment. In addition, Mr. Fred Sobeck (FAA) stated that he expected to get another FAA Inspector to participate in the group. Transport Canada also indicated that they would work on getting another member for the working group.

See attached "ACTION ITEMS FOR WORKING GROUPS" for the Committee's direction to the working groups on the products presented at this meeting.

Working Group 7 Interim Report Presentation and Discussion (Handouts 6a, 6b)

Mr. Tony Poole (Airbus) provided a status of the group's progress as indicated in Handout 6a and presented the group's draft report in Handout 6b. Mr. Poole stated that the working group had reached consensus on all but two of the sub-tasks—7.3 and 7.4. He explained that he was the dissenter in both cases, primarily because he strongly advocates logical task sequencing in the manual as it is essential to the construction of an electronic manual where information is easily accessible. And because he believed sufficient consideration was not given to how to format the index to the *Electrical Standard Wiring Practices Manual* (ESWPM). Given the non-consensus on sub-tasks 7.3 and 7.4, Mr. Poole indicated that if the working group could hold at least one more meeting, they would very likely be able to reach full consensus on these issues before the July 2002 ATSRAC meeting.

Discussion

In response to Mr. Poole's comments, Mr. Huber explained how the FAA intended to use Working Group 7's products. He noted that the FAA would reference the ESWPM in their Advisory Circular, and the Instructions for Continued Airworthiness in part 25 would be updated to require that an ESWPM be a part of every part 25 certification. In addition, he expected that the ATA would use the manual to update their specs. After additional discussion, the issue was resolved as follows: The Committee agreed to submit the working group's interim report as is to the FAA, explaining that consensus could not be reached on the two items. Then, the working group would meet to resolve the outstanding issues before the July 2002 ATSRAC meeting so that ATSRAC could submit the group's final report with full consensus on all sub-tasks. Mr. Hollinger also noted that the Committee must receive all final reports by June 25, 2002, in time for the July 2002 ATSRAC meeting.

Following a brief resumption of Mr. Poole's presentation, a lengthy discussion ensued regarding the reference to Working Group 7's draft report (Handout 6b—page 13). Mr. Thornburg indicated that there is a lack of information on the design philosophy for drip shields (e.g., where they should be placed in the airplane). The resolution of this discussion was that Mr. Don Anderson (Boeing and WG 7 Co-Chair) would research the issue and report back to the Committee.

See attached "ACTION ITEMS FOR WORKING GROUPS" for the Committee's direction to the working groups on the products presented at this meeting.

Nova Wire Integrity Program (Handout 7)

Mr. Francois Gau (Honeywell) provided an overview of Honeywell's Nova system as indicated in Handout 7, after which attendees were given a demonstration of the system.

DAY TWO

Working Group 6 Interim Report Presentation and Discussion (Handouts 7a, 7b, 7c 7d, 7e)

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Mr. Vid Variakojis (Boeing) gave a presentation of Working Group 6's products, beginning with Handout 7a, the schematic that shows the sub-tasks that will become the newly created subpart H of the FAR/CFR and JAR. This was followed by the presentation of Handout 7b (Wiring System HWG Report #4), Handout 7c (FAR/JAR for Subpart H—WS-27-03), Handout 7d (FAR/JAR for Subpart H—WS-41-01), and Handout 7e (Task 6.5 Final Report00WS 17-06).

Discussion

Ms. Christine Negroni (NADA) raised the point that the term "minimize" could be made clearer. Following the group's discussion, the Committee reached agreement that the term should be explained in the preamble of the rule. In addition, Mr. Thornburg commented that the wording "during in-service operation" should be added to part 25.1717 to read "...handhold during in-service operation or stepping, damage..." Another attendee indicated that in the "Note" section of 25HAC1301 (new 1702) change "Original Aircraft Manufacturer" should be changed to TC Holder and STC holder.

After Mr. Variakojis resumed his presentation, another discussion occurred, whereby Mr. Card questioned the numbering system in Handout 7d (AC/ACJ for the Subpart H), indicating that he would prefer seeing the FAR/CFR's numbering system harmonized with the JAR system. Mr. Huber responded that he would follow-up with the FAA on whether this can be done.

See attached "ACTION ITEMS FOR WORKING GROUPS" for the Committee's direction to the working groups on the products presented at this meeting.

Working Group 8 Interim Report Presentation and Discussion (Handouts 8a, 8b, 8c)

Mr. Spencer Bennett (FedEx) provided an update on Working Group 8 as indicated in Handouts 8a (AC—120-YY/Draft), Handout 8b (Report to ATSRAC), and Handout 8c (FAA WG Report Format). Mr. Bennett indicated that training for flight crew members had been added per ATSRAC's direction at the January 2002 meeting. He continued by stating that the drafting of the Advisory Circular for training, with the Appendices, had been completed and that all comments received had been taken into account in the drafting process.

See attached "ACTION ITEMS FOR WORKING GROUPS" for the Committee's direction to the working groups on the products presented at this meeting.

Working Group 9 Interim Report Presentation and Discussion (Handout 9a, 9b, 9c)

Mr. Randy Boren (Northwest Airlines) provided an overview of Working Group 9's status as indicated in Handouts 9a (EZAP Implementation Proposal), 9b (Task 9 Harmonization Working Group—Report to ATSRAC), and 9c (Aging Transport Systems Rulemaking Advisory Committee—Task 9—Draft Interim Report).

Discussion

Attendees' discussion of the presentation primarily involved the time line for industry to comply with accomplishing the EZAP tasks as referenced in the SFAR, which is included in Handout 9. In regard to the proposed EZAP implementation time line, Mr. Thornburg stated that the FAA should keep in mind that this is one of three major maintenance program revisions that is being imposed on operators. The three programs include PCP (completed in 1999), EZAP, and the proposed Aging Aircraft Safety rule. Each program requires the operators to do a complete maintenance program rewrite on their fleet. This represents a significant economic burden to the airlines.

Mr. Guy Borowski (Airtran Airways) made the following comments: In general, the compliance period for the EZAP tasks would be 3 or 6 years (depending on the area) or the repeat interval whichever occurs first. As other attendees indicated, it may be many years before any inspection was accomplished, and this might not be acceptable to the FAA. The final date of the compliance period represents the last day that the last aircraft in the fleet would have to be inspected, not the day that operators would wait to inspect all aircraft. He added that in his

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opinion, the airlines would schedule the inspections in conjunction with the first access opportunity after the rule is enacted, so that there would not be situations where multiple aircraft would be out of service at the same time. For economic reasons, airlines would have to balance the workload, and spread the inspections evenly over the implementation period. Therefore, the first inspection results would be available shortly after the rule is enacted.

The resolution to the discussion was to submit the compliance dates to the FAA that the working group has established and allow the FAA to determine the appropriate compliance dates that will appear in the rule.

See attached "ACTION ITEMS FOR WORKING GROUPS" for the Committee's direction to the working groups on the products presented at this meeting.

Administrative—Review of Action Items

In the interest of time, Mr. Shaw (Acting Chair—Afternoon Session) called for a review of current action items and the disposition of action items from the January meeting. Mr. Shaw indicated that all of the January action items had been completed, except for item 5, which would be carried over to the list for April. Ms. Stroman then read the list of April 2002 action items.

Wire Degradation Study Phase I Results (Handout 10)

Mr. David Lee (FAA Technical Center) presented the information in Handout 11, giving the outcome of Phase I of the study and explaining the status of Phase II and Phase III.

EAPAS Update (Handout 11)

Mr. Massoud Sadeghi (FAA) provided a brief status of EAPAS activities as outlined in Handout 10.

Other Business

Mr. Shaw stated that Mr. Gunter Friedrich (Lufthansa Technical Training) had requested that Mr. Huber respond to the following question: Where will it be written that cockpit and cabin crews are required to receive wire training? Mr. Huber indicated that he would provide a response to Mr. Friedrich's questions.

Adjournment: The meeting adjourned at 3: p.m. MST

Attendees: (Handout 12)

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Action Items for Working Groups

WORKING GROUPS 6 - 9

Working Groups' 6-9 final reports are due to ATSRAC by June 25, 2002.

WORKING GROUP 6

1. Define the term "minimize" in the preamble of the rule by discussing how the term has been used historically as it relates to inspections.
2. Regarding 25.1705(c)(d)—
 - The WG is to provide a definition in the AC for heavy current carrying cables referenced in paragraph (c).
 - The Committee voted without consensus to remove the word "barrier" from paragraphs (c) and (d) as "equivalent" (equivalent to separation distance) in these paragraphs means barrier. Since full consensus was not reached, the WG should resolve the issue as to whether there is a need for both barrier and equivalent to describe physical separation.
3. Reword rule language in other sections of subpart H, if appropriate, based on WG's decision with regard to deleting the term "barrier" as noted in item 2 above.
4. In the "Note" section of 25HAC1301 (new 1702) change "Original Aircraft Manufacturer" should be changed to TC Holder and STC holder.
5. Put 25.1706(e) language in advisory material and make consistent with 1309 definition of criticality. Reference NTSB recommendations on identification from TWA 800. Revise the paragraph to remove the terms "designed" and "installed."
6. The wording in 25.1706(b) refers back to 1705, so wording in 1705 should be consistent to 1706.
7. Add cargo compartments to 25.1707(a) and change "and" to "or" to read "...in the crew, passenger, or cargo compartments."
8. Section 25.1710 refers to "essential loads." The AC should address what the term "essential" means. In paragraph (b) of this section, change the word "used" to "designed" so that it reads "For airplane...designed as the primary..."
9. Revise 25.1715 to split paragraphs (a)(1) and (a)(2) so that paragraph (a) and (a)(1) remain as is; introductory paragraph (b) is added (e.g., Means must be provided to allow:); and, current paragraph (a)(2) becomes (b)(1).
10. Verify the 25H863 reference in 25.1718. Also in advisory material may want to consider explaining that spills can result from maintenance action and not necessarily through a failure of a fuel/hydraulic line.

WORKING GROUP 7

1. Submit the group's interim report as is with a cover letter stating full consensus reached on all but two items (i.e., define standard format and minimum content), then work on a full resolution of these items for the final report.

WORKING GROUP 8

1. In Section 3 of the Advisory Circular, include part 145.
2. In *Module D—Housekeeping*, consider adding item (d) under number 5 ("Protection during airplane maintenance and repair") to address contamination of protective devices for wire such as heat shields.
3. Remove the hours from Appendix B.

WORKING GROUP 9

1. In 121.376(a), change "for it" to "on behalf of the certificate holder" to read "...or alteration functions on behalf of the certificate holder must have a training program..." Also, for paragraph (c), clarify that training is only for the persons indicated in the rule. The AC, for example, includes training for flight crews, which could be optional.

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WORKING GROUP 10

1. Vic Card and Tony Heather will act as liaisons between the JAA and WG to forward WG's products to the JAA for review/comment.
2. Vic Card will contact DGAC/France for support with WG's inspections of small airplanes.
3. Transport Canada will attempt to get another member assigned to the WG.

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ATSRAC ACTION ITEMS and KEY DECISIONS

1. Appoint Working Group 10 co-chairs. (Kent Hollinger, Chuck Huber, Elli Cotti)-- Item 5 from January 2002 Action Items.
2. In IIR, add reference to Research and Development Program where cleaning procedures are noted. (Mike Nancarrow and Chuck Huber)
3. Send Mike Nancarrow a statement to clarify the reference in the IIR (item 3b1 of P1 Actions) to SWR-111 and MD11 per OEMs' comments. (Jim Shaw)
4. Send P-2 items from the IIR to Committee members, as they become available, but before May 30th. Send P-3 items by May 30th. (Massoud Sadeghi)
5. Solicit support from DGAC/France for support with WG 10's inspections of small airplanes. (Vic Card and Tony Heather)
6. Research issue of whether there is guidance available to operators on the placement of drip shield and heat shields. (Don Andersen)
7. Research issue of numbering system for rule language and respond back to Committee. (Chuck Huber)
8. Provide any additional, non-substantive comments to WG 10 Co-chairs and Kent Hollinger on the working group's products by June 28. (Committee members)
9. Provide any additional non-substantive comments to Mike Nancarrow and Kent Hollinger on WG9 reports by June 7th. Comments will be compiled in same format as the IIR. (Committee members)
10. Provide APO Economist with monetary impact of WG8's AC at the July meeting. (Spencer Bennett)
11. Prepare list of action items for working groups based on Committee's feedback on their products. (Shirley Stroman)—*Completed*
12. Provide Shirley Stroman with comments to incorporate in minutes on WG 9's report regarding implementation time frames for EZAP. (Kirk Thornburg and Guy Borowski)—*Completed*
13. Working Group Co-chairs should send their final reports to Kent Hollinger by June 25, 2002 for distribution and review by the Committee before the July 9-11 ATSRAC meeting.
14. Mr. Gunter Friedrick (Lufthansa Technical Training) requested that Mr. Huber respond to the following question: Where will it be written that cockpit and cabin crews are required to receive wire training? (Chuck Huber)

Key Decisions

1. Working Group 7 could not reach consensus on two items in their taskings. The Committee's decision was to send the WG's interim report as is with a cover letter to the FAA explaining that full consensus on these two items is expected to be accomplished before the final reports are issued in August.
2. In response to discussion about the pros and cons of compiling a list of flammable materials for the EZAP logic, the Committee agreed to table the issue with the understanding that upon completion of the FAA's research and development in this area, a determination would be made as to how to provide industry with guidance in this area.
3. Regarding the discussion about the need for testing programs to supplement visual inspections, the Committee agreed to have Working Group 9 include in their recommendations for the FAA that as the FAA validates these system, the FAA will provide the validation reports to industry for inclusion in the inspection process. The Committee also agreed that the IIR should be supplemented to note this decision.
4. Based on Mr. Nancarrow's update on the comments on the IIR and the Committee's follow-on comments (see Working Groups' Action Items attached), the Committee agreed with the direction the WGs are taking.

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5. The July 2002 ATSRAC meeting will be held in Washington, DC. The Committee will make a decision about the length and location of the October 2002 meeting at the July meeting. Several small aircraft manufacturers expressed interest in hosting the October meeting. Mr. Hollinger asked if they would follow-up with their management and e-mail him with a formal invitation.
6. In response to discussion about the time frames for implementation of maintenance requirements in WG9's rule language, the Committee's decision was to send the final report to the FAA with the time frames recommended by the working group and allow the FAA to determine the appropriate implementation time frames.
7. See attached *Action Items for Working Groups* for Committee's decisions on the working groups' reports.