

AGING TRANSPORT SYSTEMS RULEMAKING ADVISORY COMMITTEE MEETING MINUTES

Date: October 22, 2003

Place: FAA/Sandia National Laboratories AANC NDI Validation Center
Albuquerque, New Mexico

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. Mr. Hollinger then asked Mr. Dick Perry of the Sandia facility to make some remarks. Following Mr. Perry's welcome and housekeeping remarks, Mr. Hollinger thanked him for hosting the meeting and asked Mr. Vic Card (JAA, EASA) to comment on the status of the transition from the JAA to EASA.

Transition to EASA

Mr. Card began his discussion by giving an overview of the regulations that brought about the European Aviation Safety Agency (EASA) on September 28, 2003. The new agency has responsibility for certification, continued airworthiness, regulation development, and organization approval within the current 15 European Union member states. Ten member states will be added in 2004 for a total of 25 member states that will come under EASA. The Executive Director of the agency was appointed on September 1, 2003. In addition to this position, there are 12 other staff members currently on board. Because of the limited staff, the agency is relying on the existing European national aviation authorities to support its work. Along these lines, the agency's Executive Director has authorized the 15 national aviation authorities to act on his behalf and to carry out the functions and responsibilities of the agency. Therefore, the same people are doing the same work that they were prior to September 28. This includes certification approvals. The difference is the EASA Executive Director must approve the authorities' work. Given the vastness of the approval process, an amendment to current regulations is being rushed through to allow the Executive Director to appoint designees that can sign approvals on his behalf. Overall, things are working well.

Discussion

A participant asked when the maintenance regulations would be published under EASA. Mr. Card said there was about a 12-month delay in most maintenance regulations. However, with respect to Part M, which is a fairly significant change, there is a 5-year delay in the implementation schedule. The delay is due in part to maintenance schedules. This regulation will introduce a non-expiring certificate of airworthiness for each aircraft. Currently, most European countries have expiring certificates of airworthiness, so this is a significant change.

Administrative (continued)

Following Mr. Card's remarks, Mr. Hollinger began introductions of meeting attendees (Handout 1), then asked the group to review the two proposed agendas (Handout 2) and vote on either staying late to finish the meeting on day 1 (10/22/03) or ending on time and reconvening on day 2 (10/23/2003). The Committee voted 16 in favor with 1 opposing to complete the meeting in 1 day.

Approval of July 2003 Minutes (Handout 3)

Mr. Hollinger opened the floor for comments on the July 2003 minutes. Following requests for minor changes, the Committee voted unanimously to accept the minutes with the agreed-upon changes.

HWG #13 Small Transport Aircraft Report (Handout 4)

Mr. Jon Haag gave the status report on the activities of HWG 13 as shown in handout 3. He described the three tasks assigned to the harmonization working group (HWG); discussed the HWG membership, which includes representation by regulatory authorities, OEMs, repair

Approved October 2003 Minutes: January 21, 2004.

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stations, industry organizations, and owner/operators; and, he gave the status of the HWG activities, indicating that they were on schedule with the three tasks, however, further progress on the tasks was pending receipt of additional data. They do, however, expect OEM reports to the workgroup by April 2004, and the draft final report to ATSRAC is on target for October 2004.

Mr. Haag discussed the status of industry awareness and training regarding small transport aircraft. He indicated that Mr. Ric Peri (AEA) gave the presentation to the HWG on 10/21/2003, that he has been giving to technicians around the country. The presentation centers on making technicians aware of the content of 43.13, 1b, chapter 11. Mr. Haag recommended that Mr. Peri give the presentation to the Committee. Mr. Hollinger asked for the Committee's agreement, and received it, to add the presentation as an agenda item for the next ATSRAC meeting. Mr. Haag said Mr. Peri's next presentation was going to be taped, and it would be available in a CBT format for AIA members. Mr. Peri also mentioned the presentation by Mr. Massoud Sadeghi (FAA) at the recent NBAA convention that contained information on aging wiring. Following this comment, Mr. Huber asked Mr. Peri if this presentation might be helpful in doing his presentation, whereby Mr. Peri said "yes" it would. Mr. Eli Cotti (NBAA) took an action item to send a copy of the training tapes to Mr. Peri and said the training would be posted on the NBAA website. After Mr. Haag made additional comments about other awareness and training activities covering small transport airplanes, Mr. Huber commented that it would be helpful to receive information on small transports to help the FAA address the NTSB's inquiry about the Payne Stewart accident. Mr. Cotti took a second action item to provide this information to Mr. Sadeghi.

HWG # 11 Report (Handout 5)

Mr. Eli Cotti, NBAA advised the group about the recently assigned tasks to the HWG and discussed the group's membership as shown in handout 4. Mr. Hollinger reminded the group that at the July 2003 meeting HWG 11 had not been assigned specific tasks; however, they recently received three specific taskings that were voted on and approved by the Committee via e-mail. Mr. Cotti said they are on schedule for establishing a HWG, reviewing the tasks, and developing a work plan. They anticipate completing these tasks by November 13, 2003. The next WG meeting is scheduled for November 11-13, 2003 in Newark, New Jersey at the Continental facility.

Discussion

After commenting on the training-related task, a participant asked Mr. Cotti to further explain what the task meant. Mr. Cotti deferred the answer to Mr. Huber, who said when the FAA revises the regulations that require a maintenance program there is an implicit requirement to provide training on any resulting new maintenance tasks. While the FAA does not intend to mandate the training requirements that came out of HWG 8, air carriers must still provide training for the new maintenance tasks that will be mandated. The idea behind the HWG 11 task is to have a good understanding of what minimum training is necessary to implement the EZAP before the EAPAS rule is completed.

Ms. Knife asked if the taskings presented today were the only ones HWG 11 would be assigned. Mr. Huber responded, stating there are a number of things that could result in other tasks being assigned to the WG. For example, ATSRAC could request additional tasks, tasks could result from comments to the EAPAS rule (NPRM), and another alternative may come up before the FAA issues the rule. Therefore, the tasking of the group is still open, as was the intention when the WG was formed. Ms. Knife further commented that there appears to be a shift from the group developing alternatives to an emphasis on training. Mr. Huber responded, saying the reference to "alternatives" didn't mean that the group should develop alternatives to everything presented thus far to the Committee. Instead, it means the FAA would task the HWG in areas where the FAA needed assistance.

Mr. William Schultz (GAMA) asked whether the FAA's thinking regarding the HWG was being redirected based on results from the FAA's Tiger Team, which is looking at aligning the aging aircraft rules. Mr. Hollinger followed with a comment asking Mr. Huber if the Tiger Team's focus

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was only on wiring or does it include other rules like SFAR 88 and Widespread Fatigue. Mr. Huber explained that the Tiger Team is comprised of Aircraft Certification and Flight Standards staff. The intent of the team goes back to a topic the Committee has previously discussed, particularly Ric Anderson (ATA), who asked if the FAA could better align the time frames in at least a dozen rulemakings that require performance of nonscheduled maintenance checks. The FAA has also had some discussions with Congress about this issue. As a result, FAA management is looking at how the FAA might better integrate the aging aircraft rulemakings to minimize the number of nonscheduled maintenance tasks and align them with the heavy maintenance checks. This would allow for multiple compliance times to be satisfied at once. The rules under consideration are EAPAS, SFAR 88, Aging Airplane Safety, Widespread Fatigue Damage, and CPCP. The team has reviewed the requirements in these rules and will present a proposal to FAA management. Their proposal may result in changes to EAPAS. Since the team's recommendations must be briefed to the Administrator and probably to Congress before a final decision is made on any changes to the rules, Mr. Huber said he could not be more specific at this time. He added that this could delay the EAPAS rulemaking schedule. However, he said he did not believe there would be changes to the core requirements in EAPAS, like the EZAP logic. Following further discussions, the Committee agreed to have Mr. Sadeghi make a presentation on the Tiger Team results at the next ATSRAC meeting.

HWG # 12 Report (Handout 6)

Mr. Kent Hollinger (U.S. Co-chair, HWG12) presented HWG12's status report as outlined in handout 6. Mr. Hollinger discussed the status of the WG membership, which included comments that Honeywell is no longer represented in the group. Honeywell decided, for business reasons, that they would not pursue their NOVA wiring system; therefore, they did not have a need to participate in the HWG efforts. Mr. Hollinger also discussed the status of each task as shown in the handout. This was followed by a discussion of the HWG's recommendation to the FAA as indicated below.

The FAA should pursue development of an industry standard for a digital description of EWIS routing, termination, and other characteristics for use by NDI test equipment and other potential applications.

Vote on Recommendation

Following discussions, Mr. Hollinger summarized the understanding of the recommendation, saying the idea is to have the FAA promote the establishment of an industry standard that could be used in the future for a digital description. The recommendation does not include a proposal as to how the standard might be used. That is, the HWG 12 does not propose to recommend that the FAA mandate or make voluntary such a standard. Based on the discussions and clarifications, Mr. Hollinger called for a vote on whether to formally submit the recommendation to the FAA via a letter to Mr. Nicholas Sabatini (FAA's Associate Administrator for Regulation and Certification). The Committee voted 18 to 0 in favor of sending forth the recommendation. Mr. Hollinger took an action item to draft the letter.

Future Meeting Dates and Locations

The Committee discussed and agreed to the following meeting schedule:

Meeting Dates	Recommended Locations
January 21-22, 2004	Miami, FL (Airbus)
*April 28-29, 2004	Hampton, VA (NASA)
July 7-8, 2004	TBD
October 20-21, 2004	TBD

*The Committee will tour the NASA facility at Langley.

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ATSRAC Intention Regarding EZAP of Engine Wiring

Mr. Hollinger introduced the presentations on engine wiring, saying the subject of whether the EZAP logic should include engine wiring was discussed at the last ATSRAC meeting. However, it was tabled to give the next three presenters time to prepare a presentation to the Committee.

Mr. Carl Story (Garrett Aviation) made the initial presentation. He said he had discussed the topic with Garrett Aviation and wanted to express his concern that WG 1 had “conscientiously” left out engine wiring in their analysis. As a result, Garrett was concerned that the ATSRAC would make a decision on the issue with incomplete information. He said based on his research, everything showed, with the exception of the discussion at the last ATSRAC meeting, that engine wiring was not part of the EZAP.

Ms. Sarah Knife (GEAE), representing member-organization AIA as an alternate for Mr. Mike Romanowski, gave the presentation titled “Applicability of ATSRAC to Engine Installations” in **handout 7**. She gave an overview of the engine certification process, engine installation certification, existing maintenance practices, and safety experience.

Mr. Don Andersen (Boeing) presented the information in **handout 8** (“Enhanced Zonal Analysis”) He indicated that per MSG-3, an industry-accepted process, Boeing (and other manufacturers) would include engine wiring in the EZAP analysis, regardless of what ATSRAC may recommend. This is the case because it is more efficient and less costly to do so.

Discussion

After discussing the presentations at length, the Committee concluded that engine wiring would continue to be included in the EZAP analysis. The discussion included the contents of the EPAS NPRM HWG 9 sent to the FAA. Ms. Knife expressed concern that compliance with MSG-3 is not the same as compliance with the SFAR (in HWG 9’s NPRM) because there is a gap between doing the work and demonstrating compliance with a requirement. The SFAR, she said, requires demonstration of compliance with the rule. Mr. Huber addressed her concern, stating that if a manufacturer goes through the MRB process and includes the latest revisions to MSG-3, which is not the version WG9 recommended, and the operators incorporate that version of the MRB in their maintenance program, that will constitute compliance with the regulation—the SFAR and the part 121 requirement.

The group also discussed at length the meaning of “wiring discrepancy” as stated in the EAPAS NPRM. They expressed concern that the term “discrepancy” is unclear so may present problems in terms of proving compliance. Ms. Knife said the term is open to interpretation. For example, if there are two nominally identical engine installations and the wiring on one goes two inches in one direction and the wiring on the other goes two inches in another direction but both work perfectly well, one might still be identified as a discrepancy. Mr. Cliff Neudorf (Transport Canada) responded, saying from a maintenance perspective, when doing the EZAP, checking to see if wires are routed properly would not be a part of the process. Instead, the focus in a general inspection would be on whether there is obvious damage or degradation to wiring. Ms. Knife acknowledged understanding of Mr. Neudorf’s comments.

Mr. Hollinger asked if the discussions and clarifications about engine wiring had adequately addressed the Committee’s concerns. Ms. Knife indicated that she was satisfied with the outcome if the meeting minutes reflect that the FAA agrees to review and clarify the term “discrepancy” in their revised version of HWG 9’s NPRM per today’s discussions, and that it would be sufficient to put a general warning at the front of a maintenance manual about the need to safeguard wiring, and that this need not be repeated for each task involving wiring.

Other Business

Mr. Huber informed the group that GAO recently published a report titled Cabin Safety and Health Issues. GAO promotes arc fault circuit breakers as being beneficial to cabin safety issues related

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to fires. Mr. Huber said he is not sure how this may affect the FAA and industry. Additional information on the topic can be found at www.gao.gov. After logging onto the GAO website, click on *Other Publications*. Then click on the search button at the top of the page and enter report number GAO-04-33. The report is dated October 17, 2003.

Review of Open and New Action Items

Adjourn: 5:45 pm

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**October 22-23, 2003
Action Items**

1. Send training CD from NBAA Conference to Ric Peri and to Kent Hollinger. Mr. Hollinger will post the information on the ATSRAC website. (Eli Cotti)
2. Provide copies of articles and other information to Massoud Sadeghi on small transport wiring topics to help the FAA address the NTSB recommendations related to the Payne Stewart accident. (Eli Cotti)
3. Prepare letter to Nick Sabatini (AVR-1) with the Committee's recommendations for the FAA to develop an industry standard for a digital description of EWIS routing, etc. for use by NDI test equipment. (Kent Hollinger)
4. Process waiver for the January 2004 ATSRAC meeting in Miami. (Chuck Huber, Shirley Stroman)
5. Obtain block of rooms for Miami ATSRAC meeting. (Patrick Glapa)
6. Send thank-you letters to the three contractors that performed the wire test demonstrations during the ATSRAC's tour of Sandia National Laboratories. (Kent Hollinger)

Action Items Pending from July 2003

- (4) Provide data about 91.409(f3)(f4) to Eli Cotti from Op Specs. (Fred Sobeck)

Action Items Pending from April 2003

- (3) Solicit European Co-chair for WG12. (Tony Heather, Chris Davies)*

*Committee recommends selecting Co-chairs from among operators if possible.

Action Items Pending from January 2003

- (3) Advise Committee how the FAA will harmonize the various aging rules on compliance times (i.e., Tiger Team results). (Massoud Sadeghi)

KEY DECISIONS AND CONCLUSIONS

- The Committee voted unanimously in favor of sending the FAA a written recommendation to develop an industry standard for a digital description of EWIS routing, etc. for use by NDI test equipment.
- The Committee discussed at length the subject of the inclusion of engine wiring in the EZAP and concluded that the EZAP will cover engine wiring. In addition, agreement was reached that the main points of the discussion will be captured in the minutes for the October 2003 session.
- The Committee agreed to include in the January 2004 meeting agenda a training presentation by Ric Peri and a discussion by Massoud Sadeghi about the results of the Tiger Team's recommendations on aging aircraft safety rules.
- The Committee agreed on the following dates for future meetings:

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