

considerations, and only complies with part 25 of the Federal Aviation Regulations (14 CFR part 25) as a minimum. For this reason, paragraph (e) of the final rule requires that repair approval must specifically refer to this AD. No change to the final rule is necessary in this regard.

Request for Credit for Modification Per Original Issue of Service Bulletin

One commenter states that paragraph (c) of the proposed AD describes optional modification and post-modification inspections per Revision 1 of the referenced service bulletin; however, the commenter notes that operators may already have done the modification of the area specified per the original issue of that service bulletin. The commenter adds that information received from the manufacturer suggests that airplanes modified per the original issue should have additional inspections and modifications. The manufacturer recommends (and the commenter agrees) that these actions should be done within 3,000 flight cycles or 18 months after the initial modification.

Although the commenter does not specifically ask for a change to the proposed AD, we infer that the commenter wants credit for airplanes previously modified per the original issue of the service bulletin, and confirmation that the additional actions recommended by the manufacturer are indeed required. We agree that any operator that has done the modifications per the original issue of the service bulletin is required to do additional inspections and modifications per Revision 1 of the service bulletin. With regard to actions accomplished per the original issue of the service bulletin that correspond to actions in Revision 1 of the service bulletin, we already give credit for actions accomplished before the effective date of an AD by means of the phrase "Compliance: Required as indicated, unless accomplished previously," which appears in every AD. Therefore, no change to the final rule is necessary in this regard.

Request To Reference Existing AD and Relation to New AD

One commenter states that the proposed AD affects an area that is the subject of AD 94-15-18, amendment 39-8989 (59 FR 41233, August 11, 1994), and Boeing 747 Supplemental Structural Inspection Document (SSID) D6-35022, and can affect Structurally Significant Item (SSI) F-39E. The commenter asks that any related requirements between the new AD and the existing AD be discussed. The

commenter adds that the effect of repairs, modifications, and duplication of inspections done per the existing AD should be reviewed, and a determination made of whether one set of AD requirements meets the existing AD requirements.

We have been informed by the manufacturer that the Boeing 747 SSID is being revised to remove the portions of SSI F-39 inspections that are required by this AD. This revision to the Boeing 747 SSID may be approved as an alternative method of compliance to AD 94-15-18, which would eliminate the potential for duplication of inspections. In addition, repairs and modifications done per the existing AD will not be affected by the requirements in this AD. Therefore, no change to the final rule is necessary in this regard.

Request To Withdraw Proposed AD

One commenter disagrees that the cracking found in the upper corners of the aft lower cargo door cutout constitutes an unsafe condition that warrants regulatory action. The commenter states that the cracks reported by Boeing in the referenced service bulletin were small and did not pose an imminent threat of rapid depressurization. The commenter notes that the robust structure of the lower lobe cargo door cutout mitigates threats from minor skin cracks. The commenter adds that cracks found on the commenter's airplanes were found as a result of routine maintenance inspection, proving that existing inspection and maintenance programs will detect cracking in the subject areas before an unsafe condition exists. The commenter states that a minor revision to the maintenance program would ensure adequate crack detection, without the need for additional regulatory action.

We do not agree with the commenter. Cracks over one inch in length have been found in both the fuselage skin and the adjacent bear strap. If cracks propagate into the sill chord, rapid decompression could occur. The door hinge fairing also covers up the area of cracking, making it unlikely that all cracks will be detected by routine maintenance inspections. No change to the final rule is necessary in this regard.

Request To Change Cost Impact Analysis

One commenter states that the FAA estimate of approximately 3 work hours to accomplish the proposed inspection does not include the time required to gain access and close-up. In the case of this AD, some of the associated access and close-up time, including removing

and re-installing fasteners and fittings, is not incidental, and is only required for this particular inspection procedure. The commenter notes that those costs should be included in the cost impact analysis. The commenter adds that the other costs, such as access and closeup of seats, carpet, cargo handling equipment, floor panels, and insulation blankets, may be incidental during some scheduled heavy maintenance inspections, but would not be incidental if done during a special maintenance visit.

We do not agree to change the number of estimated work hours for the inspections. The number of work hours necessary to accomplish the inspections, specified as 3 in the cost impact information, is consistent with the service bulletin. This number represents the time necessary to perform only the inspections actually required by this AD. We recognize that, in accomplishing the requirements of any AD, operators may incur additional costs due to special circumstances when scheduling maintenance visits. However, because maintenance schedules vary significantly from operator to operator, the hours necessary for access and closeup time, including removing and re-installing fasteners, are almost impossible to calculate. Therefore, no change is made to the final rule in this regard.

Requests To Change Compliance Time

One commenter asks that the compliance time specified in paragraph (a)(2) of the proposed AD be changed from "For airplanes with 13,000 or more total flight cycles as of the effective date of this AD: Do the inspection within 1,000 flight cycles or 1 year after the effective date of this AD, whichever is first," to "For airplanes with 13,000 or more flight cycles as of the effective date of this AD: Do the inspection within 1,000 flight cycles after the effective date of this AD." If a calendar-driven timetable is used, to prevent unnecessary special maintenance visits, the commenter asks that paragraph (a)(2) be changed to, "For airplanes with 13,000 or more flight cycles as of the effective date of this AD: Do the inspection within 1,000 flight cycles or 18 months after the effective date of this AD, whichever occurs first." The commenter states that the subject cracking is caused by fatigue, and such cracking is attributed to cyclic loading, not calendar time, so requiring a fatigue-related inspection based on calendar time is not justified. The commenter adds that most 747 operators currently use C-check inspection intervals of 18 months. Due to this fact, the commenter