

airplanes that have accumulated more than 12,000 total flight cycles, and exceeded the 8-year limitation, will be subject to the proposed 2-year compliance time. The commenter adds that, since no seed units have been provided by Boeing, procurement of the spindle is expensive, and the turnaround time is expected to be 20 days, there is no reason to ground the airplane and send the spindle for overhaul without having any spares.

- One commenter states that it will take about a year to obtain parts after ordering them, and the overhaul cannot be completed until the parts are received. The commenter states that it will be impossible to overhaul/replace the flap carriage within the proposed 2-year compliance time.

- One commenter asks for a change in the compliance time specified in paragraph (c) of the original NPRM from 12,000 flight cycles or 8 years, whichever occurs first, to 20,000 flight cycles or 8 years in-service, whichever occurs first. The commenter states that the additional flight-cycle allowance would allow the work to be done at every other D-check where time and resources to overhaul/replace the spindles are available. The commenter requests that this change apply to both the original inspection and the overhaul/replacement requirements.

- One commenter asks that we evaluate the requirement to overhaul or replace the spindles every 12,000 flight cycles or 8 years, based on inspection results and parts replacement costs. The commenter adds that the repetitive inspection intervals required by paragraph (a) of the proposed AD should be extended from 180 days to 18 months, so the airplane can be scheduled for inspection during heavy maintenance check intervals.

- One commenter states that mandating the overhaul of the carriage spindles every 8 years or 12,000 flight cycles, whichever is sooner, will have a significant cost impact on its fleet. The commenter adds that, under the current maintenance program, the carriage spindles are overhauled every 8 years, which, at current flying rates, equates to about 18,000 flight cycles. Therefore, a 12,000-flight-cycle compliance time would require overhaul at every heavy maintenance check, thereby doubling the overhaul cost. The commenter proposes that the carriage spindles remain in service until the 8-year limit is reached, provided the 180-day repetitive inspections are reinstated once the airplane reaches 12,000 flight cycles. The commenter states that this would provide an equivalent level of

safety and give operators a significant cost benefit.

We agree to extend the initial compliance time somewhat. In revising this compliance time, we considered the safety implications, parts availability, and typical maintenance schedules of affected operators. In addition, the repetitive NDT inspections required by the existing AD, and restated in paragraph (a) of this supplemental NPRM, will allow operators more time to schedule maintenance and ensure safety in the interim until accomplishment of the overhaul or replacement. We have extended the compliance time specified in paragraphs (c)(1)(i) and (c)(1)(ii) of this supplemental NPRM to the later of the following: "Before the accumulation of 20,000 total flight cycles on the carriage spindle, or within 8 years since overhaul of the spindle or installation of a new spindle, whichever is first," or "Within 2 years after the effective date of this AD." We have extended the compliance time specified in paragraphs (c)(2)(i) and (c)(2)(ii) of this supplemental NPRM to the later of the following: "Before the accumulation of 20,000 total flight cycles on the carriage spindle, or within 8 years since overhaul of the spindle or installation of a new spindle, whichever is first," or "Within 4 years after the effective date of this AD." We have also extended the compliance time in paragraph (c) of this supplemental NPRM for the repetitive overhaul or replacement to every 20,000 flight cycles or 8 years, whichever is first. Extending the compliance time will not adversely affect safety but will accommodate the time necessary for the operators to obtain replacement parts and schedule the work.

We do not agree to extend the repetitive inspection intervals required by paragraph (a) of the supplemental NPRM; those inspections end when the overhaul or replacement specified in paragraph (c) of this supplemental NPRM is done. In developing an appropriate compliance time for the repetitive inspections, we considered not only the degree of urgency associated with addressing the subject unsafe condition, but the manufacturer's recommendation as to an appropriate compliance time, and the practical aspect of accomplishing the repetitive inspections within an interval of time that parallels normal scheduled maintenance for the majority of affected operators. No change to the supplemental NPRM is necessary in this regard.

Request To Change Compliance Time to Calendar Time

One commenter contends that corrosion associated with the identified unsafe condition is a function of time rather than flight cycles. We infer that the commenter requests that the original NPRM be revised to reflect a compliance time for the spindle overhaul/replacement in terms of calendar time rather than flight cycles. We do not agree to use a calendar date in the AD because the compliance time in this case is a function of fleet utilization, which is unrelated to calendar dates. No change to the supplemental NPRM is necessary in this regard.

Request for Credit for Previously Overhauled Carriage Spindles

One commenter asks that the carriage spindles overhauled before issuance of AD 2002-22-05 (no finish/plating required) remain in service for 8 years or 12,000 flight cycles, whichever comes first. The commenter has been proactive on this issue, and started carriage spindle overhauls prior to the effective date of the original NPRM. The commenter adds that no fractured carriage spindles have been found to date.

We do not agree with the commenter. Although we acknowledge the fact that the commenter has not had any carriage spindle failures and maintains a good track record for diligent completion of AD requirements, many operators have been working to overhaul their fleets before the release of the AD in order to minimize the impact on the fleet. In light of the fact that the finish/plating removal was not required before issuance of AD 2002-22-05, carriage spindles that were overhauled before issuance of that AD may not have had the finishes/platings removed, and would not be compliant with that AD. Therefore, no change to the supplemental NPRM is necessary in this regard.

Request To Accept Alternative Methods of Compliance (AMOCs) Approved for AD 2002-22-05

Two commenters ask that the original NPRM be revised to accept certain AMOCs previously approved for AD 2002-22-05. One commenter states that the original NPRM does not have a provision for such AMOCs, and asks that a paragraph be added for previously approved AMOCs for paragraphs (a) and (b) of the original NPRM. The commenter recognizes that it would not be able to use previously approved AMOCs after paragraph (c) of the supplemental NPRM is accomplished.