



AIR TRANSPORT ASSOCIATION

January 31, 2005

Docket Management Facility,  
U.S. Department of Transportation,  
Attention: Docket No. FAA-2004-19863, Directorate Identifier 2003-NM-29-AD,  
400 Seventh Street SW.,  
Nassif Building, Room PL-401,  
Washington, DC 20590.

**Subject:** A318, A319, & A320 – Escape Slide/Raft Assembly – Proposed Rule Response

Ladies/Gentlemen:

FAA proposes to supersede an existing airworthiness directive (AD) for certain Airbus Model A318, A319, and A320 series airplanes. The existing AD currently requires modification of the telescopic girt bar of the escape slide/raft assembly, and follow-on actions. This proposed AD would mandate a new modification of the telescopic girt bar, which would terminate the repetitive functional tests required by the existing AD. ATA appreciates the opportunity to comment on this proposed rule.

Our members generally support the intent of the rulemaking; however, additional review and clarification would be desirable on the attached comments. Specifically:

- **Referenced Service Bulletin:** Request subsequent revisions 3 and 4 to the referenced Service Bulletin be permitted.

Your serious consideration of these observations and comments would be greatly appreciated.

Sincerely,

Robert Peel  
Director of Quality  
Air Transport Association

Attachment



United Services

January 6, 2005

Air Transport Association of America  
1301 Pennsylvania Ave., NW, Suite 1100  
Washington, D.C. 20004-1707

Attention: Mr. Robert Peel  
Director of Quality

Subject: Airbus Escape Slide/Raft Assembly Telescopic Girt Bar  
Docket No. NPRM 2003-NM-29-AD

Reference: ATA Memo 04-AD-485

Dear Mr. Peel,

The referenced ATA Memo advised of and requested comments on the subject proposed rule that will require Service Bulletin A320-52-1112 Revision 2 accomplishment. We concur with the contents of the proposed rule, however we request that subsequent revisions 3 and 4 of the Service Bulletin be permitted.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jim Miccio". To the right of the signature are the initials "CBS" and "JMM" written in a lighter ink.

Jim Miccio  
Chief Engineer

cc: R. Bernicchi, United Airlines - INDEG  
G. Borsari, United Airlines - INDEG  
P. Sesny, United Airlines -SFOEG