Federal Express Corporation Aircraft Structures Engineering 3131 Democrat Road Memphis, TN 38118



January 2, 2008

Federal Aviation Administration Transport Airplane Directorate Attention: Rules Docket No. FAA-2007-0225 Directorate Identifier 2007-NM-210-AD

Dear Sir or Madam,

In response to Notice of Proposed Rulemaking, Directorate Identifier 2007-NM-210-AD, dated November 26, 2007, Federal Express offers the following comments:

- Upon review of Boeing Service Bulletin 757-54-0015, FedEx noticed that the effectivity given in the 'Concurrent Service Information' section of the proposed AD does not match the service bulletin effectivity. Service Bulletin 757-54-0015 addresses the replacement of the older hinge fitting for airplanes line numbers 2 through 241. FedEx requests for the FAA to explain the difference in aircraft effectivity between the service bulletin and the proposed Airworthiness Directive.
- 2. The proposed AD effectivity in paragraph 2(c) states that it will apply to 757-200, -200CB, -200PF, and -300 series airplanes equipped with Rolls Royce RB211-535E engines. However, FedEx aircraft will be modified from the -200 passenger configuration to a special freighter configuration and thus requests that the 757-200SF category be added to the applicable aircraft listing. Upon the release of the AD, FedEx will submit the STC to the FAA to confirm the new certification of the aircraft.
- 3. Boeing Service Bulletins 757-54-0049 and 757-54-0050 state in Section 1.D "Description" that the repetitive inspections are no longer necessary once the preventive modification is accomplished. FedEx would like to confirm that the accomplishment of the preventive modification will terminate any further inspections per the proposed AD, and requests that the FAA list the accomplishment of the preventive modification as a terminating action for the proposed AD.

Any questions concerning the content of this letter should be directed to FedEx Engineer Lydia Eppic via phone at 901-224-4846, or via email at lydia.eppic@fedex.com.

Sincerely,

Wayne D. Richmond

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