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subject NPRM 2007-NM-346-AD Comments.

KLM has evaluated SB 737-53A1266-R0 and NPRM 2007-NM-346-AD and has compared the required actions with SB 737-55-1057-R1 and AD 2004-22-05 from which KLM concludes the following:

- 1) The new AD paragraph (i) states that accomplishing all of the applicable actions specified terminate the repetitive inspections required by paragraph (f) of the AD.
- 2) 737-300/-400/-500 SRM chapter 53-60-01 Repair 9 and Repair 10 provide for repairs of the fuselage skin at the dorsal fin landing between BS857 and BS908 (Repair 9) and BS857 and BS887 (Repair 10). These repairs include the installation of 0.016 inch thick CRES wear strips identical to those installed per SB 737-53A1266-R0 wear strip installation (BS857-BS908).
- 3) Both SRM repairs and SB 737-53A1266-R0 do not install wear strips aft of BS908 (BS908-BS1006).
- 4) Inspection requirements per AD 2004-22-05/SB 737-55-1057-R1 of the fuselage skin aft of BS908 (BS908 to BS1006) are identical to those per SB 737-53A1266-R0 and the new AD. The new AD, however, does not require repeat inspections of the skin after additional detailed inspection for damage to dorsal fin seals, attach clip, and seal retainer, and accomplishment of applicable corrective actions/modifications.
- 5) Per SB 737-53A1266-R0 and NPRM 2007-NM-346-AD KLM understands that terminating action for the area:
 - a) between BS857 and BS908 consists of inspection for damage to fuselage skin, dorsal fin seals, attach clip and seal retainer, nose cap modification (seal retainers and attach clip), and wear strip installation. Damaged seals must be replaced. Fuselage skin damage must be repaired per 737-300/-400/-500 SRM 53-60-01 Repair 9 or Repair 10.
 - b) between BS908 and BS1006 consists of inspection for damage to fuselage skin and dorsal fin seals. Damaged seals must be replaced. Fuselage skin damage must be repaired per FAA approved repair.

Based on the above KLM comments the following:

- 1) KLM request the new AD to accept that inspections of the fuselage skin aft of BS 908 are not required if inspections previously done per AD 2004-22-05/SB 737-55-1057-R1 have resulted only in findings between BS857 and BS908 (no findings aft of BS908), and where a repair has been installed per 737-300/-400/-500 SRM chapter 53-60-01 Repair 9, including installation of CRES 0.016 inch thick wear strips. [NOTE *1].

Similarly, KLM request the new AD to accept that inspections of the fuselage skin areas between BS857 and BS908 covered by a repair previously installed per 737-300/-400/-500 SRM chapter 53-60-01 Repair 9, including installation of CRES 0.016 inch thick wear strips, are not required. [NOTE *1].

- 2) KLM request the new AD to accept that inspections of the fuselage skin aft of BS 887 are not required if inspections previously done per AD 2004-22-05/SB 737-55-1057-R1 have resulted only in findings between BS857 and BS887 (no findings aft of BS887), and where a repair has been installed per 737-300/-400/-500 SRM chapter 53-60-01 Repair 10, including installation of CRES 0.016 inch thick wear strips. Wear strip installation between BS887 and BS908 per SB 737-53A1266-R0 and actions per [NOTE *1] are still required to terminate inspections.


Similarly, KLM request the new AD to accept that inspections of the fuselage skin areas between BS857 and BS887 covered by a repair previously installed per 737-300/-400/-500 SRM chapter 53-60-01 Repair 10, including installation of CRES 0.016 inch thick wear strips, are not required. Wear strip installation between BS887 and BS908 per SB 737-53A1266-R0 and actions per [NOTE *1] are still required to terminate inspections.

NOTE *1:

A one-time detailed inspection for damage to dorsal fin seals, attach clip, and seal retainer, and accomplishment of all the applicable corrective actions per the Accomplishment Instructions of SB 737-53A1266-R0 is still required.

Best Regards,



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