



November 7, 2020

U.S. Department of Transportation
Subject: Clearance of Renewed Approval of Information Collection: 49 U.S.C.
44701/Service Difficulty Report

References: 1. DOT Rulemaking Docket No. FAA-2020-0752
2. OMB Control No. 2120-0663
3. 14 CFR Part 121.703 Service Difficulty Reports

Dear Sirs,

Please accept the following in comments to the above referenced Department of Transportation (DOT) Federal Aviation Administration (FAA) Docket regarding Service Difficulty Reporting:

Observations and Request for changes

- (1) FedEx Express requests a minor amendment to 14 CFR §121.703 (a), (15) where it states: "Cracks, permanent deformation, or corrosion of aircraft structures, if more than the maximum acceptable to the manufacturer or the FAA." For reasons listed in items 2 and 3 below, we submit the language be amended to read aircraft *primary* structure.

Detailed Comments and Requests for Changes

- (2) Our primary reason for requesting this revision is aircraft maintenance technicians (to include at heavy check maintenance vendor facilities worldwide) often incorrectly equate secondary structure items like broken brackets and damaged seal retainers with primary structure resulting in submittal of voluminous unnecessary SDRs. However, by adding the "primary" language we are eliminating all secondary structure items from their consideration.

Desired Revision Suggestion

- (3) The amended language to 14 CFR §121.703 (a), (15) would read: "Cracks, permanent deformation, or corrosion of aircraft *primary* structures, if more than the maximum acceptable to the manufacturer or the FAA."

Supporting Documentation for Changes

- (4) Supporting documentation for this amendment to 14 CFR §121.703 is rescinded CFR 14 CFR §121.704 (a), (3), which stated: "Cracks fractures, or bonding in a

composite structure that the equipment manufacturer has designated as a *primary* structure or a principal structural element.”

If you have any questions regarding these comments, please feel free to contact me at wwilliams1@fedex.com or by phone at (901-487-9917).

Sincerely,

A handwritten signature in dark ink that reads "Bill Williams". The signature is written in a cursive, slightly slanted style.

Bill Williams
Manager, Regulatory Compliance
Safety & Airworthiness Dept.
FedEx Express