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A68-38

FEB 17 1969

Mr. David R. Thomas
Acting Administrator
Federal Aviation Administration
Department of Transportation
Washington, D. C. 20590

Dear Mr. Thomas:

This is in reference to the Notice of Proposed Rule Making of Identification Docket No. 7521, Notice 68-22, dealing with durability requirements for turbofan engines and their installations.

We are in agreement with the basic premise that alleviation of the rotor fan blade containment requirement is warranted as a practical necessity. Nevertheless, we do recommend several revisions of the proposed amendments contained in the NPRM.

It is felt that specific notation should be made in Part 25 to ensure that crew and passenger protection is taken fully into account. To accomplish this, a suggested insertion in Paragraph 25.903(e)(2), between the words "damage" and "would," is "would not include injury to occupants and..."

In the Section 33.75 provisions toward proving fan rotor integrity, it is believed test conditions should be made more explicit, with simulation and "corrected results" kept to a minimum, commensurate with the tremendous potential for damage and loss of life, if all practically possible is not realistically accomplished in prototesting. In this vein, we suggest revising the first sentence of Paragraph 33.75(d) to read, "The capability required in (b) of this section will be confirmed by ground test, and in (c) by flight test when ..." Also, we recommend the deletion of subparagraph (d)(2), so that the section is terminated by the word "parameter" in subparagraph (d)(1).

Sincerely yours,
Original signed by

Joseph J. O'Connell, Jr.

Joseph J. O'Connell, Jr.
Chairman