

DISPOSITION OF PUBLIC COMMENTS AC 91-56B, CONTINUING STRUCTURAL INTEGRITY PROGRAM FOR AIRPLANES			
Commenter	Comment	Requested Change	Disposition
UK CAA	The proposed AC did not include sufficient information on service bulletin reviews and aging aircraft programs.	Include the text the European Aging Aircraft Working Group (EAAWG) presented to cover these points	We agree and have revised the AC to include information on aging aircraft programs. We also provided a reference to additional background information that can be found in Appendix 4 of AC 120-XX, <i>Damage Tolerance Inspections for Repairs and Alterations</i> .
America West	Include a sample DT assessment report in the AC.		We could not determine if it would be beneficial to include a sample report in this AC because the commenter did not indicate how a DT-assessment report would be used and did not provide enough information about the scope of such a report. No change has been made to the AC in regard to this comment.

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Boeing	If a revised cost/benefit assessment indicates a rule is warranted, withdraw § 121.370(a) and the associated draft AC 91-56B relating to the large transport category airplanes in favor of tasking ARAC's Transport Airplane and Engines Issues Group to develop appropriate direction for the FAA to follow.		We have determined that this comment is no longer applicable to this final AC because the ARAC working group has closed its task related to this item and submitted its report. The rules affiliated with the aging airplane program and the associated advisory material are proceeding as indicated in the Aging Airplane Safety Final Rule.
Transport Canada	Will the FAA assign extended design-life goals to airplanes with SSIDs?		In the Aging Airplane Safety Final Rule we removed the design-life goal supplemental inspection requirements related to design-life goal airplanes. We also removed inspections based on service-history that were mandated by airworthiness directives. Therefore, airplanes with SSIDs will not be subject to design-life goal requirements. The AC has been revised to reflect these changes.

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Transport Canada	Does the statement “cracks must be difficult to detect during regular maintenance” indicate that widespread fatigue damage should be evaluated?	If widespread fatigue damage should be evaluated the FAA should clarify in the AC that the effects of such an evaluation in extending design-life goals.	We will address WFD in a separate rulemaking with its own AC. No change is needed to this AC.
Transport Canada	Include only repairs, alterations, and modifications (RAMs) generated by TC holders in the AC. RAMS generated by non-TC holders should be addressed through alternate means, such as ADs.		This AC does not establish any requirement. The requirements for addressing RAMS generated by TC holders and non-TC holders are addressed in the Aging Airplane Safety rule.