

March 31, 2021

U.S. Department of Transportation  
Docket Management Facility  
1200 New Jersey Avenue, SE  
West Building Ground Floor, Room W12-140  
Washington, DC 20590

Re: Petition for Extension of Exemption No. 13337B, Regulatory Docket No. FAA-2015-2368

Ladies/Gentlemen:

In accordance with 14 CFR Part 11, Southwest Airlines hereby petitions the Federal Aviation Administration to grant an extension of Exemption No. 13337B (FAA Docket No. FAA-2015-2368), currently scheduled to expire on July 31, 2021. Exemption No. 13337B provides relief from 14 CFR §121.629(b) to enable Southwest's Boeing 737-700, -800, and -8 aircraft to takeoff when cold soaked fuel frost (CSFF) is present on upper wing surfaces, subject to the following conditions and limitations:

- 1. The dispatch and takeoff with CSFF on upper wing surfaces only applies to Southwest Airlines Boeing 737-700, -800, and -8 aircraft as specified in the Boeing engineering and aeronautical analysis.*
- 2. Southwest Airlines will use and adhere to the Boeing 737-700, -800 Airplane Flight Manual (AFM) Miscellaneous Limitations for CSFF, and the Boeing 737-8 AFM Certificate Limitations for CSFF in all instances concerning CSFF.*
- 3. This exemption does not relieve Southwest Airlines from any other limitation or requirements with regards to deicing and anti-icing operations.*
- 4. This exemption is provided and effective under the following conditions:*
  - (a) The appropriate Southwest Airlines operations manual contains the following limitations and conditions from the FAA approved B-737-700, -800, -8 AFM:*

*Takeoff with cold soaked fuel frost on the wing tank upper surfaces is not permitted if any of the following conditions are present:*

- (1) The ambient air temperature is below +4 degree C, +39 degree F.*
  - (2) The tank fuel temperature is below -16 degree C, +3 degree F.*
  - (3) There is cold soaked fuel frost on the wing tank upper surfaces that is beyond the lines defining the permissible cold-soaked fuel frost area.*
  - (4) There is precipitation or visible moisture (rain, snow, drizzle, or fog with less than 1 mile visibility).*
- (b) FAA has approved Southwest Airlines CSFF pilot training program and any assigned pilots must have been trained prior to applying CSFF exemption standards.*

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*(c) Southwest Airlines must provide ground and operational training to all pilots and ground personnel to ensure each is able to clearly discern the applicability of the CSFF exemption requirements, to include identifying which Southwest Airlines aircraft have the painted CSFF upper wing areas. The training must include recognition of those airplanes approved for CSFF exemption.*

*(d) The pilot-in-command retains final authority for takeoff of a flight with CSFF.*

Boeing has applied painted lines defining an area on the upper surface of the wings on the Boeing 737-700, -800, and -8 aircraft where, with certain other limitations, CSFF is permissible. Further, Boeing has issued "Miscellaneous/Certificate Limitations" specific to takeoffs with CSFF in its FAA-approved AFM for the Boeing 737-700, -800, and -8 aircraft. The FAA's approval of the Boeing 737-700, -800, and -8 aircraft AFM and CSFF provisions contained therein evidences the FAA's concurrence with Boeing's determination that operations with CSFF present can be safely conducted, subject to the limitations in contained in the AFM.

This petition does not seek to change the conditions and limitations of the current exemption. Indeed, the conditions and reasons regarding public interest as described in our March 22, 2019 petition and acknowledged in Exemption No. 13337B regarding public interest and safety remain unchanged. The renewal of this exemption is not a controversial issue, and granting the requested extension will set no precedents. Accordingly, Southwest Airlines requests that a finding of good cause be made for waiving publication in the *Federal Register* (14 CFR §11.87). We appreciate the agency's prompt consideration and grant of the extension requested. To minimize the administrative burden on all parties, Southwest seeks a renewal of a minimum of three years, with a longer extension preferred.

Please contact the undersigned or Jim Stieve at 469-603-4259 or jim.stieve@wnco.com, if you have any questions or need additional information.

Respectfully submitted,



Jeff Hamlett

JH/jgs

cc: Alan Kasher, Executive Vice President Daily Operations  
Bob Waltz, Vice President Flight Operations  
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