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U.S. Department of Transportation
Docket Operations, M-30, West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE
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Subject: Docket No. FAA-2020-1028; Project Identifier AD-2020-00978-T

Reference: (A) Notice of Proposed Rule Making (NPRM): Docket No. **FAA-2020-1028; Project Identifier AD-2020-00978-T**
(B) Boeing SB 717-57A0027 - WINGS - Inboard and Outboard Spoilers - Spoiler Assembly Doublers and Splice Bar Inspection

SUMMARY:

Reference (A) proposed B717 AD would require inspections to the LH & RH Spoiler Assembly to ensure each spoiler has splice bar having part number 3914588-501 and two doublers having part/number 5940974-31. This AD requires doing the repair before further flight using a method approved in accordance with the procedures specified in paragraph (k) of this AD.

DELTA'S COMMENTS

Reference (A) Paragraph (g) states "...At the applicable times specified in the "Compliance" paragraph of Boeing Alert Requirements Bulletin 717-57A0027 RB, ...". Reference (B) Para 1.E Compliance requires a GVI of the correct splice bar & doubler configuration with 6,400 flight hours or 27 months after the AD effective date. Because of the Covid-19 pandemic airlines have a large quantity of aircraft in storage. Delta asks that the TOA is changed to 27 months of flying days instead of calendar days. The unsafe condition is not a concerned with an aircraft in storage.

Reference (A) Paragraph (h)(2) states "This AD requires doing the repair before further flight using a method approved in accordance with the procedures specified in paragraph (k) of this AD." The unsafe condition was prompted by a report of discrepant spoiler assemblies, having the wrong splice bar installed and lack reinforcing doublers. Delta request an approved method to correct the unsafe condition to remove & discard any non blueprint parts and reassembly per OEM spoiler drawing 5940974-1/-2/-501/-502. The OEM spoiler drawing 5940974-1/-2/-501/-502 was acceptable for the type certification basis for the 717-200 Model airplane during the assembly of the aircraft. Restoring the spoiler to the OEM blueprint would restore the part to an approved configuration with the unsafe condition removed.

If you have any further questions or require additional information, please contact **Rozana Chamberlain – Sr Engineer, Department 578**, at **(404) 992-2332** or email at rozana.v.chamberlain@delta.com. Please include the AD Process & Compliance Engineering group in all correspondence with email: adengineering@delta.com.

Thank you,

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