



September 04, 2025

U.S. Department of Transportation
Docket Operations
M-30
West Building Ground Floor
Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

Re: Comments of Airlines for America to three (3) FAA's Notice of Proposed Rulemaking (NPRMs), Project Identifier AD-2024-00721-T (FAA-2025-1105), Project Identifier AD-2024-00719-T (FAA-2025-1367), Project Identifier AD-2024-00720-T (FAA-2025-1718)

Airlines for America (A4A), on behalf of its affected members,¹ appreciates the opportunity to comment on the following Federal Aviation Administration's (FAA) notice of proposed rulemakings (NPRMs):

- **Project Identifier AD-2024-00721-T (FAA-2025-1105) "Airworthiness Directives; The Boeing Company Airplanes" (737-900).**
- **Project Identifier AD-2024-00719-T (FAA-2025-1367) "Airworthiness Directives; The Boeing Company Airplanes" (737-700).**
- **Project Identifier AD-2024-00720-T (FAA-2025-1718) "Airworthiness Directives; The Boeing Company Airplanes" (737-800).**

We support the NPRMs subject to the comments that follow.

A4A and its members strongly recommend that previously approved Alternative Method of Compliance (AMOCs), which uphold the required level of safety, continue to be authorized under the relevant sections of the new Airworthiness Directives (ADs).

Historically, when the FAA supersedes structural ADs with a new AD, it allows for previously approved AMOCs from the superseded ADs to remain valid for the new one. Previously approved AMOCs have been evaluated using either damage tolerance analysis criteria or appropriate regulatory requirements and are designed to maintain the necessary safety standards. It is important to note that the new ADs do not change the scope of the inspections mandated in the superseded AD, only the thresholds are revised.

¹ A4A's affected members are Alaska Air Group, Inc.; American Airlines Holdings, Inc.; Atlas Air Worldwide Holdings; Delta Air Lines, Inc.; Southwest Airlines Company, and United Airlines Holdings, Inc. Air Canada is an associate member.

If the rules are not amended as proposed, operators would need to resubmit many previously approved and valid AMOCs, creating unnecessary burdens for all stakeholders and potentially causing aircraft groundings and compliance delays. Many AMOCs would require reprocessing within the 600-flight cycle grace period (90–180 days), some immediately, despite typical AMOC processing times of 4–12 weeks per AMOC.

To address this, we propose common amendments to the NPRMs, detailed in the attached comment logs, and have included 737-900 comments with those for the 737-800 due to the closed comment period as recommended by the FAA project lead.

A4A strongly recommends that the FAA revise its proposals to allow previously approved AMOCs that maintain the intended level of safety to remain authorized under the new ADs.

We thank the FAA for considering our feedback and look forward to continuing our collaborative efforts in support of aviation safety.

Respectfully submitted,


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AIRLINES FOR AMERICA