

Subject: Fwd: Re: EB 83A and the FAA
From: Mary Baeten <mibaeten@mcb-industries.com>
Date: 8/23/2019, 2:43 PM
To: "Nielsen, Mark (Ron Johnson)" <Mark_Nielsen@ronjohnson.senate.gov>

Hey Mark...

Did you receive this ? Will this work for you ? Is there something else you need from me ?

Please let me know.

Thank you ...

Mary Baeten
MCB Industries, Inc.
920-712-7344

----- Forwarded Message -----

Subject: Re: EB 83A and the FAA
Date: Mon, 19 Aug 2019 15:09:25 -0500
From: Mary Baeten <mibaeten@mcb-industries.com>
To: Nielsen, Mark (Ron Johnson) <Mark_Nielsen@ronjohnson.senate.gov>

Hey Mark....

Will this work for you ?

EB 83A is based on an assumption. It assumes the coefficient of friction to be .370 between the galvanized faying surfaces. The FAA's own testing indicates this is not true. If the testing shows an actual coefficient of friction average of .144 with 3 galvanized spacer rings, how can the recommendations (requirements) in EB 83A be based on an assumption ?

By using an assumption EB 83A undermines the integrity of the FAA Equipment Certification Program and the FAA's reluctance to follow their own testing or the generally accepted engineering coefficient of friction for faying surfaces.

The Federal Highway Association requires a coefficient of friction minimum of .450 This is required for vehicular traffic and must be met to receive FHWA funding. How can the FAA assume a lower coefficient of

friction for aircraft traffic ?

By using EB 83A requirements to receive AIP funding, the FAA requires an airport to install a failure. Who is liable ?

On 8/12/2019 7:16 PM, Nielsen, Mark (Ron Johnson) wrote:

The registered letters would be a good start to confirm they have received, we can forward the request if you put together a request and what you are asking for.

V/R

Mark Nielsen

From: Mary Baeten <mbaeten@mcb-industries.com>

Sent: Wednesday, August 7, 2019 1:57 PM

To: Nielsen, Mark (Ron Johnson) <Mark_Nielsen@ronjohnson.senate.gov>

Subject: EB 83A and the FAA

Hey Mark...

Anything on this ?

I did find out that the Federal Highway Department requires the AASHTO minimum Class B ($\mu=.50$) or Class D ($\mu=.45$) slip coefficient for funding on highway projects. If the FHWD requires this for bridges, why would the FAA assume a lower one for airplanes ?

We have sent correspondence on this issue to:

Kahli Kodsi - Manager of Airport Safety & Standards, Airport Engineering Division (emailed 06/28/19)

Kirk Shaffer - Associate Administrator, Office of the Associate Administrator for Airports (emailed 07/09/19)

Winsome Lenfert - Deputy Associate Administrator, Office of the Associate Administrator for Airports (emailed 07/09/19)

As of today no response, not even an acknowledgement of receipt.

Again, the FAA in EB 83A requires that the airport install a failed bolt joint.

Also... the FAA did not follow -53 (see the bold section ii) there was no follow up on the comments... attached are my comments on Draft EB 83A. I specifically brought up the slip coefficient problem. The FAA asks for comments, we spend hours writing the comments, the FAA ignores the comments.

12. REVISION OF SPECIFICATIONS. The FAA may, at times, revise the specification for a particular equipment to reflect changing needs of aviation or of new technology. The process of specification revision is intended to allow for constructive interaction between the FAA and other affected parties.

a. The process of specification revision is generally as follows:

- i. The FAA distributes a draft revised Advisory Circular to allow for comment from third party certifiers, certified manufacturers, and selected users of the equipment.
- ii. **Once the FAA has received comments, either a meeting of affected parties is scheduled for discussion of comments or resolution will be by direct communication based on the changes requested.**
- iii. The FAA distributes a second draft to all parties and posts it on the Internet for general comment from the public. Certified manufacturers in the program are advised of the posting.
- iv. Once the FAA has considered all comments, FAA releases the new revised equipment specification as a new revised Advisory Circular

Can you let me know the next step ? Do we send the letters registered mail with return receipt requested ?

Thank you.

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