

QUADRO COMPARATIVO

33.83		Justificativa
RBAC 33 Emenda 33-32	RBAC 33 Emenda 33-33	
<p>§ 33.83 Vibration test. (a) Each engine must undergo vibration surveys to establish that the vibration characteristics of those components that may be subject to mechanically or aerodynamically induced vibratory excitations are acceptable throughout the declared flight envelope. The engine surveys shall be based upon an appropriate combination of experience, analysis, and component test and shall address, as a minimum, blades, vanes, rotor discs, spacers, and rotor shafts. ...</p>	<p>33.83 Vibration test. (a) Each engine must undergo vibration surveys to establish that the vibration characteristics of those components that may be subject to mechanically or aerodynamically induced vibratory excitations are acceptable throughout the declared flight envelope. Compliance with this section must be demonstrated by engine test, and must address, as a minimum, blades, vanes, rotor discs, spacers, and rotor shafts. The conduct of the engine test should be based on an appropriate combination of experience, analysis, and component test. [SEÇÃO DELETADA EM 20 DE SETEMBRO de 2012] ... (a) Each engine must undergo vibration surveys to establish that the vibration characteristics of those components that may be subject to mechanically or aerodynamically induced vibratory</p>	<p>Na verdade, esta emenda 33 não alterou absolutamente nada em comparação à emenda 32. O que ocorreu foi que a FAA propôs uma mudança em 5/julho/2012 para esclarecer um ponto no parágrafo (a) com relação à necessidade de testes e considerou que não gerava nenhum <i>burden</i>. Porém, após reclamações da indústria, resolveram voltar atrás. No final, nada mudou. Abaixo a explicação completa da FAA: “On July 5, 2012, the FAA published a Technical Amendment entitled, "Airworthiness Standards: Aircraft Engine" (77 FR 39623). In that technical amendment, the FAA intended to clarify vibration test requirements in Sec. 33.83 of 14 Code of Federal Regulations Part 33. By letter dated August 3, 2012, the Modification and Replacement Parts Association (MARPA) asserts that the rule appears to be a substantive change that should have been open to public comment. The MARPA further asserts that had the rule been open for comment, it and others would have commented that the technical amendment undermines the</p>

QUADRO COMPARATIVO

	<p>excitations are acceptable throughout the declared flight envelope. The engine surveys shall be based upon an appropriate combination of experience, analysis, and component test and shall address, as a minimum, blades, vanes, rotor discs, spacers, and rotor shafts.</p> <p>[SEÇÃO RESTABELECIDA]</p>	<p>existing regulatory system, rather than improving it, and that it imposes unnecessary burdens on the applicant and the government with no commensurate safety benefit. We do not agree with MARPA's assertion that the rule change was substantive. However, in the interest of transparency in the rulemaking process, we are changing the language of Sec. 33.83(a) amendment 33-33 back to the language in Sec. 33.83(a) of the previous amendment 33-17.”</p>
--	--	--