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Federal Aviation Administration (FAA)  
800 Independence Ave., S.W.  
Washington, D.C. 20591  
United States of America

**Assessment; safety recommendation issued to FAA (FAA control number 13.010)**

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On 25 January 2013 the Swedish Accident Investigation Authority (SHK) published a report, RL 2012:03, concerning a serious incident that occurred on 4 April 2012 in the airspace east of Gävle, Gävleborg County, Sweden, involving an aircraft with the registration LN-RPS. In the report SHK issued a safety recommendation to EASA and FAA.

On 23 December 2013 SHK received the FAA reply to the recommendation (se attachment).

According to Article 18.2 regulation (EU) No 996/2010 of the European Parliament and of the Council on the investigation and prevention of accidents and incidents in civil aviation, the safety investigation authority shall inform the addressee whether or not it considers the reply adequate and give justification when it disagrees with the decision to take no action.

SHK wants to emphasize that the recommendation only states that a limitation of flight altitude *should be taken into consideration* in the event of failure of one pressurization system during flight in a similar way as when this is identified before dispatch. The words *consider* or *take into consideration* should in this context be interpreted as to think about something carefully, especially in order to make a decision.

SHK agrees that an altitude limitation following a single pressurization system may be partially negated by an increased risk due to greater exposure to weather, increased fuel consumption, adverse impact on reserves, and other operational issues. That is why SHK does not recommend mandatory corrective action.

However SHK is of the opinion that a pilot in command of a Boeing B737 is capable of doing a risk assessment in the event of failure of one pressurization system during flight, thus being "one failure away from a complete loss of pressurization", and decide if a lower level of flight is appropriate considering

all operational factors. Hence SHK disagrees with FAA:s decision to take no further action.

SHK also disagrees with the FAA opinion that operations at "lower" altitudes should imply higher risks than operating at high altitudes. A replanning of the cruising altitude during flight must be considered as a normal procedure and can be caused by a number of factors as stronger headwind than calculated, ATC reasons, technical limitations etc.

When assessing the need for completion of the text in the B737 QRH, the existing altitude limitations in the MMEL when dispatching with only one pressurization system operative should be kept in mind. If there had been no – or negligible – risk increment regarding single system operation at high altitudes, there had been no necessity for operational limitations in the MMEL.

Again, SHK maintains the opinion that the text in the B737 QRH should be revised with crew consideration concerning stop of climb – or descend to an operationally acceptable flight level – if one of the pressurization systems fail.

On behalf of SHK



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