



WHS 02-39

**General Aviation  
Manufacturers Association**

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November 6, 2002

Docket Management System  
Docket No. FAA-2002-13464  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh Street, SW.  
Washington, DC 20590-0001

**Subject: Docket FAA-2002-13464: GAMA Requests 90-Day Extension of Comment Period for SNPRM 02-17, *Improved Seats in Air Carrier Transport Category Airplanes*, (67FR62294, October 4, 2002)**

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The General Aviation Manufacturers Association (GAMA) is a national trade association representing over 50 manufacturers of fixed-wing aircraft, engines, avionics, seats, and components. GAMA member companies also operate fleets of aircraft, airport fixed-based operations, and pilot training and maintenance technician training facilities across the nation.

GAMA has performed an initial review of SNPRM 02-17, *Improved Seats in Air Carrier Transport Category Airplanes* (67FR62294, October 4, 2002) and finds that the new proposal is significantly different from the original proposal NPRM 88-8 and related discussions at the 1995 and 1998 public meetings. Furthermore, this is an extremely complex proposal because it significantly impacts several stakeholders such as operators, seat manufacturers, airplane manufacturers, and repair facilities and requires a seat certification program for each aircraft. Therefore, GAMA respectfully requests that FAA issue a 90-day extension to the comment period so that the proposed requirements can be adequately reviewed by our member companies to provide for the development of meaningful and substantive comments.

Please contact me at [wshultz@generalaviation.org](mailto:wshultz@generalaviation.org) or (202) 393-1500 if there are any questions or comments regarding this request for a 90-day extension to the comment period for SNPRM 02-17.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Schultz", is written over a light blue, textured background.

William Schultz  
Vice President, Engineering & Maintenance

Copy: Hal Jensen, FAA AIR-120

