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FAA CRS VN4R602M

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60506

26<sup>th</sup> July, 1999

United States Department of Transportation Dockets  
400 Seventh Street, SW  
Room Plaza 401  
Washington, DC 20590

ORIGINAL

Reference: Docket No. FAA-1999-5836, Notice No. 99-09 -17

Dear Sir/Madam;

Please consider this a Request for Extension of Time for comments to the above referenced Docket under 14 CFR 11.29( c).

Petitioner, Commodore Aviation Inc., is an FAA Certificated Class IV Repair Station involved in the maintenance, alteration and preventive maintenance of transport category aircraft. Commodore Aviation is currently certificated under 14CFR Part 145, and therefore has a substantive interest in the proposed rule.

Commodore Aviation uses non-certificated sources to perform maintenance, preventive maintenance or alteration. Under the proposed rule, these non-certificated sources will be required to allow the Federal Aviation Administration (FAA) access to their facilities for the purpose of determining compliance with the Federal Aviation Regulations (FARs). Commodore Aviation seeks the extension of time for comments in order to provided those non-certificated sources a copy of the proposed rule making and to allow those non-certificated entities the time to review the notice and to provide their comments.

As such, good cause exists to extend the comment period to the maximum allowable on the basis on the FAA's own observation in the notice that this proposed rule has been under consideration since 1975. The proposal contains many changes to the requirements for the certification of repair stations which must be carefully considered. Commodore Aviation must thoroughly review the NPRM from all aspects to determine potential operating and financial impacts.



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In addition, the likelihood that the public will be given another opportunity to provide the agency substantive information and comment on the rules governing repair stations is remote considering the time it has taken to issue this proposal. This means that the proposed rule must be able to address future issues in a manner that allows the agency and the public to have confidence in the rule and the entities governed by the rule. It is imperative that all interested parties be given as much time as possible to review the proposal and provide substantive information and comment. Commodore Aviation believes that the current comment period is insufficient for this purpose.

For the reasons stated, it is the agency's and indeed, in the public's best interest to provide the maximum amount of time for comments on this proposal.

Therefore, Commodore Aviation respectfully requests the FM extend its Comment Period, at a minimum to December 31, 1999.

Sincerely,

A handwritten signature in black ink, appearing to read "Delmer C. Adler". The signature is fluid and cursive, with the first name being the most prominent.

Delmer C. Adler  
Director Quality Control

DCA/cmb

cc: A. BenBasat - President, Commodore Aviation

docket-faa-1999-5836