

Raytheon 61077

**ORIGINAL:**

Raytheon Systems Company  
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August 4, 1999

In reply Reference: 8-24410/99L-088

United States Department of Transportation Dockets  
400 Seventh Street, S. W.  
Room Plaza 401  
Washington, D. C. 20590

RE: Docket No. FAA-1999-5836 - 25  
Notice No. 99-09

Dear Sir or Madam:

Please consider this petition as a Request for Extension of Time for Comments to the above referenced Docket under 14 C. F. R. Part 11.29 ©.

As Petitioner, Raytheon Systems Company (RSC) Greenville, Repair Station number **TR1R516K**, is engaged in maintenance, alteration and preventive maintenance of civil aviation products, components and parts. We our a large repair station with approximately 670 personnel. As an entity currently certificated under 14 C. F. R Part 145, the Petitioner has substantive interest in the proposed rule.

RSC Greenville uses non-certificated sources to perform maintenance, preventive maintenance, or alterations. 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 determination of compliance with the Federal Aviation Regulations ( **FARs**). Among other reasons, Petitioner seeks the extension of time for comments in order to provide ample time for discussions with our non-certificated source to study the proposed rule and make comments.

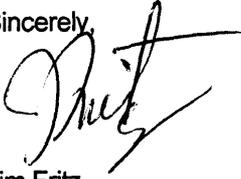
Also, RSC Greenville's parent company, Raytheon Company, Inc., operates a large number of certificated repair stations with which the Petitioner shares resources. Petitioner seeks sufficient time to coordinate proposed changes with each operating unit affected by the proposed rule.

In addition, RSC Greenville believes that good cause exists to extend the comment period to the maximum allowable on the basis that the proposed rule contains many changes to the requirements for the certification of repair stations. These changes must be carefully analyzed for the impact to our operations, which includes our ratings, manual, doing business with outside vendors, interaction with our sister companies, and basically how this rule change will effect how we do business. The current time for comments does not allow for a diligent study of the full impact of these proposed changes.

RSC Greenville believes 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 in the entities governed by the rule. We believe that the current comment period is not sufficient for this purpose.

SEP 14 1999 11:37 AM  
DEPT OF TRANSPORTATION

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Fritz", with a long horizontal flourish extending to the right.

**Jim Fritz**  
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