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Pratt & Whitney Engine Services

Turbine Component Technologies
2800 Avenue E East
Arlington, TX 76011
(817) 607-1400 Fax: (817) 649-7325

Certified Repair Station #PY0R983N

ORIGINAL



Pratt & Whitney

A United Technologies Company

DEPT. OF TRANSPORTATION
DOCKET SECTION
99 AUG 21 AM 11:53

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

RE: Docket No FAA-1999-5836--33
Notice No. 99-09

Please consider this a Request for Extension of Time for Comments to the above referenced Docket under 14 C.F.R. §11.29(c).

Pratt & Whitney Turbine Component Technologies Air Agency Certificate Number PY0R983N is involved in the maintenance, and preventive maintenance of civil aviation products, components and parts and is currently certificated under 14 C.F.R. Part 145.

Upon review of the proposed NPRM, we find it too complex and detailed to submit a reasoned response within the time allotted. The proposed changes, including those related to monitoring of suppliers, training, tooling and many other factors will require in depth analysis to fully ascertain the impact upon our business and to respond in a complete and detailed manner. The proposed changes in the requirements for a Repair Station Manual and changes in the Repair Station Rating and Capability List requirements will require additional and continuing administrative burden upon our business.

In order to provide a proper response, each proposed change will need to be analyzed and comment made. We believe that good cause exists to extend the comment period to the maximum allowable. The FAA stated its own observation in the NPRM that this proposed rule had been under consideration since 1975, yet only 120 days were given for response. Considering the financial and compliance impacts upon our business that are contained in the NPRM, we respectfully request the FAA extend its Comment Period, at a minimum, to December 31, 1999.

Sincerely,

Patrick Dempsey
General Manager