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ORIGINAL



Asian Compressor Technology Services Co. Ltd.

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Kuanyin, Taoyuan Hsien, Taiwan, ROC FAA#C50Y850N

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

RE: Docket No FAA-1999-5836 - 55
Notice No. 99-09

99 SEP 13 PM 2:19
DEPT OF TRANSPORTATION
DOCKET SERVICE UNIT

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

Asian Compressor Technology Services Co. Ltd., Air Agency Certificate Number C50Y850N 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,

Sean D. Keohane
General Manager