

89959

DEPT. OF TRANSPORTATION  
DOCKETS  
00 JUL 27 PM 2:14

Chad Lemmen  
174 E Cleveland  
Coopersville, MI 49404

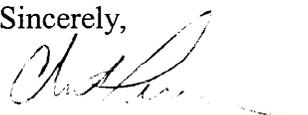
U.S Department of Transportation Dockets  
Docket No. [FAA-2000-7623] -- 31  
400 Seventh Street SW  
Room Plaza 401  
Washington DC 20590

Presidential Executive Order No. 12866 directs the FAA to review its regulations every three years. I am a pilot and aircraft owner. Since the FAA is asking for comments on the FAR's, I am proposing to make some changes to part 43 of the regulations. I feel aircraft owners should be allowed to do more of their own maintenance. The regulations as they are currently written cause an undue economic burden on the private aircraft owner. Specifically the annual inspection required by FAR 91.409 can be extremely costly for an individual. It makes it difficult to afford being an aircraft owner.

I do think FAR 91.409 should remain as written because the annual inspection is important to aviation safety, but I see no reason why the aircraft owner can not perform and sign off the annual. This should apply only to aircraft which are not used under Part 121, 127, 129, 135 or commercial operations under Part 91. The aircraft owner/pilot is likely to be more meticulous about the inspection than a mechanic would be since their safety depends on it. Of course if the owner does not feel qualified to perform the inspection than a mechanic or IA could still be used. To ensure that the owner is familiar with doing the inspection, it could be required that at least one annual is completed with the supervision of an IA on the same make and model.

In order to make it legal for an aircraft owner to perform the annual inspection, Appendix A to Part 43 par.(c)Preventive Maintenance needs to be amended. It needs to be amended to include the items listed in Appendix D to Part 43 (Scope and Detail of Items to be Included in Annual and 100-Hour Inspections). This would then make it legal based on Part 43.7(f)"A person holding at least a private pilot certificate may approve an aircraft for return to service after performing preventive maintenance under the provisions of 43.3(g)"

Major alterations and major repairs will still be required to be performed by the holder of a mechanic certificate or an inspection authorization. So any discrepancies found during the inspection fitting under the category of "major" would need to be fixed by an appropriately rated mechanic.

Sincerely,  
  
Chad Lemmen