

14CFR21 requires immediate modernization. Subpart F should be deleted and Subpart G revised to reflect the noncontractual portions of SAE AS9100:1999 as they relate to current Subpart F & G quality system requirements. Once a production certificate has been granted, new or derivative model production should not have to undergo a complete recertification. Rather, only those areas which exceed (e.g., measurement capability, new materials and processes) the existing approval should need be examined.

Given the relative inefficiency of FAA (or DOT for that matter) rulemaking, it may be wise to wait for the next iteration of SAE AS9100 which will have as its basis ISO 9001:2000, which introduces a more process focused approach to quality management systems.

14CFR25 needs updating to recognize the concept of firmware/EPROM/software as most modern transport category aircraft rely on these to function safely.