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ORIGINAL

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U.S. Department of Transportation Dockets  
Docket No. (FAA-2000-7623) -41  
400 Seventh Street SW  
Room Plaza 401  
Washington, DC 20590

Subject: Review of Existing Regulations

Gentlemen:

The following are my comments:

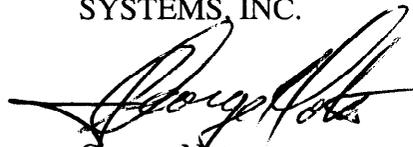
**Revise 8130.21** With the advent of the aircraft industry's adoption of the 8130-3 Airworthiness Approval for standardization of traceability documents, an undue burden has been placed upon the manufacturer. The manufacturer is now forced to pursue more FAA Designees/DAR's to support shipment of product. This may result in delays in shipments to the customer and certainly will result in additional costs to the manufacturer. Additionally, not all manufacturers are PAH's and cannot support this requirement of the larger OEM's. Other considerations include additional FAA training and designee surveillance.

**Recommendation:** Allow manufacturers to sign 8130-3 document when used for domestic traceability. Do not call it an Airworthiness Approval. Call it a Certificate of Conformance. This is essentially how it is being used by the major OEM's. This would also place the accountability and responsibility where it belongs with the manufacturer! The other option is to discontinue use of FAA Form 8130-3 for domestic Airworthiness Approval.

Please contact me if you would like to discuss further.

Very truly yours,

BFGOODRICH AVIONICS  
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George Nota  
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