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*NOT ADMITTED IN D.C.

June 1, 1999

BY HAND DELIVERY

Federal Aviation Administration
Office of the Chief Counsel
Attn: Rules Docket (AGC-200)
Room 915G
800 Independence Ave., SW
Washington, DC 20591

FAA-2000-7952-24

Re: Docket No. 28293

Dear Sirs:

The International Association of Machinists and Aerospace Workers, AFL-CIO ("IAM"), through the undersigned counsel, hereby submits its comments on the proposed rulemaking in the above-referenced docket.

The IAM represents the largest organized segment of workers in commercial aviation, with nearly 120,000 members at seven of this country's top ten major airlines, and at many national and regional carriers as well. Our members work as mechanics and related personnel, inspectors, dispatchers, ramp service employees, stock clerks, customer service agents, flight attendants, dining service workers, and clerical personnel.

The IAM fully supports proposed changes designed to update and improve the reporting requirements for air carrier certificate holders and certificated repair stations concerning failures, malfunctions, and defects of aircraft, aircraft engines, systems and components. The Federal Aviation Administration's supplemental notice of proposed rulemaking in the above-referenced docket makes significant improvements to the "service difficulty" reporting process.

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Despite these major improvements, the IAM sees further room for change. For example, we support an additional requirement that aircraft total time and total cycles be recorded. Further, station and flight numbers should also be required to permit tracking of particular problems occurring at a specific station or airport.

Respectfully submitted,



Joseph Guerrieri, Jr.
Debra L. Willen

Counsel for the IAM

cc: Robert Roach, Jr.
James R. Sprang