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U.S. Department
of Transportation
**Federal Aviation
Administration**

FLIGHT STANDARDS DISTRICT OFFICE 19
One Thorn Run Center, Suite 200
1187 Thorn Run Extension
Coraopolis, Pennsylvania 15108

November 8, 1995

Federal Aviation Administration
Office of the Chief Counsel
Attention: Rules Docket (AGC-200)
Docket No. 28293
800 Independence Avenue, S.W.
Washington, DC 20591

NOV 14 1995

Dear Sir:

This office has reviewed the Notice of Proposed Rulemaking published in the Federal Register, Volume 60, Number 156, dated Monday, August 14, 1995. The subject is 14 CFR 121 "Operational and Structural Difficulty Reports; Proposed Rule."

We offer the following comments:

Page 42003, 121.703(d) references a centralized collection point as specified by the FAA. Comment: The local Flight Standard District Office should be required to review the data prior to its submission to the centralized collection point.

Page 42003, 121.704(c) reporting requirement. Comment: We agree that the defect should be reported as listed in 121.704(c), however, aircraft that are undergoing a heavy maintenance check (D Check) may not have that data available within 72 hours of discovery. A provision should be added to the rule that in cases when the aircraft is out of service for extended periods of time as in the case of a heavy maintenance visit, the reporting requirement should be within 72 hours of the aircraft being approved for return to service.

Sincerely,


James J. Ballough
Acting Principal Maintenance Inspector

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