

The FAA should reexamine its position with respect to this rule.

The FAA is now requiring the submission of SDRs for repairs performed where the repair data is not contained in the appropriate manual. Does this require the submission of a SDR if the repair title is contained in the manual but the repair instructions are not, or is a SDR required if the repair performed is an equivalent repair to one listed but not published in full in the manual?

The FAA claims that by not having the PMI have to review and forward reports it will save \$1.40 million over ten years. Yet while making that statement it also says that it wants the reports to be available for a period at the air carrier for the FAA to review if the PMI wants to see it. It has been my understanding that the prime reason for having the SDR go through the CMO was for the PMI to determine if the difficulties being reported were peculiar to the operator and not a universal problem. It was also to be a gauge of the effectiveness of the operator's approved maintenance program. Obviously, this review is no longer going to take place or there would be no cost saving for the FAA to claim. In addition, since the FAA offices have computers and an internet connection, there is no reason why the FAA cannot access its own system to conduct any SDR review required rather than have the airline maintain copies for the PMI to review should he or she desire to do so.

I also fail to see any costs included in the economic section that reflects an increase in charges from those repair stations that agree to submit SDRs for their customers. These costs have to be borne by someone and to expect that the repair stations will do it for free is not a sound assumption.

The FAA goes to great pains to repeatedly state that it needs this information yet nowhere does it require the leasing companies that own engines and aircraft and have them overhauled by repair stations to submit SDRs. If the engine/aircraft is not on a FAR 121/125/135 certificate at the time of overhaul the data so badly needed by the FAA is not going to be submitted. Obviously, it must not be that badly needed.

Perhaps the FAA should be required to prove that it needs the SDRs and the expanded reporting requirements of the rule rather than merely stating that it does.