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October 17, 2000

**BOMBARDIER
AEROSPACE**

Short Brothers (USA), Inc.
Route 76 East - Building B
PO Box 904
Bridgeport WV 26330 USA
Telephone (304) 842-8824
Fax (304) 842-2571
E-mail: bobwalling@compuserve.com

Docket Management System (DMS)
U.S. Department of Transportation
Room Plaza Level 401
400 Seventh Street SW
Washington, DC 20590-001

Attention: Docket No. "FAA-2000-8017" - 4

Dear Sir/Madam:

COMMENT:

While I fully agree with the intent of Docket "FAA-2000-8017," but I feel that there are adequate loopholes in the proposal to allow unscrupulous brokers/individuals to obtain and market parts on which the life limited has expired without the end user being aware of the expiration.

For example, operator "A" removes a part that has reached its life limit and segregates the part in accordance with proposed paragraph (b)(1), some time later operator "A" removes the part from segregation for sale to a scrap dealer in accordance with proposed paragraph (c), and tags the part in accordance with paragraph (b)(5). The scrap dealer removes the tag, cleans the part and sells the part an operator/repair agency/parts broker, indicating there is a reduced (falsified) hour/cycle/etc. usage on the part, or indicating that the part is new. The part, with expired life limit is then installed on a type certificated product, with the installer having documentation that it is a serviceable part.

This is not just a possible scenario, it is one that we all know has taken place, and the proposed rule would not prevent such actions.

PROPOSED CHANGES/ADDITIONS:

Include the following in proposed paragraph (b)(1): "When the part being removed from segregation has the life limit expired, the part must be marked in accordance with paragraphs (b)(2) and (b)(4). Parts that cannot be marked as referenced will be destroyed in accordance with paragraph (b)(3)."

Add the following sentence to the end of paragraph (c): "When the part being removed from segregation has the life limit expired, the part must be controlled using one of the methods in paragraphs (b)(2) through (b)(4)."

Please contact me if you have any questions on this correspondence.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Walling". The signature is written in a cursive style with a large, sweeping initial "R".

Robert J. Walling
Director - Technical Support