



Page McGirr  
Manager, Quality Systems

(TEL) (513) 243-8941  
(FAX) (513) 243-8357

GE Engine Services, Inc  
1 Neumann Way, M/D G58  
Cincinnati, OH 45215-6301

November 13, 2000

Dear Sir or Madam:

GE Engine Services, Inc. hereby submits the attached comments on Document FAA-2000-7952-32, "Final Rule, Request for Comments on the Information Collection Requirements," Docket No. 28293, Service Difficulty Reports. GE Engine Services and its controlled affiliates hold numerous domestic and foreign repair station certificates pursuant to FAR Part 145 and together on behalf of General Electric Company provide comprehensive maintenance, repair and overhaul services for commercial airlines, regional airlines, corporate airlines, and corporate aviation. These comments are on behalf of all GE Engine Services repair stations.

GE Engine Services agrees with what we believe to be the basic intent of this change in the rule for the reporting of "Operational and Structural Difficulty Reports" as originally set forth in Notice No. 95-12 (60 FR 41992) in 1995 and later revised and reissued as SNPRM Notice 95 – 12A (64 FR 18766) in 1999. GE Engine Services supports the effort to collect and disseminate accurate safety information to the aviation industry. However, significant issues exist with the interpretation of what is a reportable event under the new rule and to what products the rule is intended to apply. The language in Part 121.704(a)(4) illustrates our concerns.

In the original NPRM, section 121.704(a)(4) proposed to require air carriers to report failures or defects of aircraft primary structures and principal structural elements, when data developed by a Designated Engineering Representative (DER), under SFAR 36, or other approved repair data that is not found in the manufacturer's Maintenance Manual (MM) is used to accomplish the repair. This definitive language, however, does not appear in the final rule.

The final rule states as follows:

*"Sec. 121.704 Service difficulty reports (structural).*

*(a) Each certificate holder shall report the occurrence or detection of each failure or defect related to--*

*(4) Repairs made in accordance with approved data not contained in the manufacturer's maintenance manual. "*

There is no mention of aircraft primary structures or principal structural elements. Without the clarifying language from the original NPRM this requirement is open to inconsistent interpretation regarding applicability to aircraft, aircraft engines, appliances or other articles and their individual components. In fact, evidence of the absence of a clear, consistent interpretation is already available. In the Federal Register/ Volume 65, No. 180 / Friday, September 15, 2000 / Rules and Regulations on pages 56192 and 56193 the FAA responded to one comment as follows:

*".... Section 121.704(a)(4) requires the reporting of each of the following: 1) any defect that leads to replacement, 2) any rework that exceeds the manufacturers' established allowable damage limits, 3) any defect in PSE's (Primary Structural Elements), or 4) repairs made in accordance with approved data not contained in the manufacturer's maintenance manual."*

This interpretation is not consistent with the purpose of this sub-paragraph as stated in the original NPRM. GE Engine Services feels that varying interpretations of this sub-paragraph will lead to unnecessary reports being made and will impose both an administrative and financial burden on repair stations. GE Engine Services is greatly concerned about the significant increase in the number of reportable events and the corresponding financial and administrative burden of gathering the necessary information for both initial and supplemental reports that the promulgation of this rule will require. This is particularly important as to how it would be applied to a repair station that specializes in the repair of individual engine components.

The FAA estimate of increased costs of \$2.00 per year, on average, for each repair station is unrealistic. Events must be documented by maintenance personnel, analyzed to determine whether or not they are reportable and collected internally in a centralized function. Thereafter, formal reports would be prepared and submitted to either our carrier customers for reporting under their systems or, if delegated to us by our customers, reports would be made directly by GE Engine Services facilities to the FAA. In order to accomplish these additional tasks, procedures and processes must be established, appropriate resources employed, training provided and administrative systems put in place. GE Engine Services estimates that costs for filing each original and supplemental report will be an average of \$16.00 per report for potentially thousands of individual reports annually.

GE Engine Services appreciates the opportunity to provide comments on the information collection requirements of this rule. Should you have any questions please call me at my direct dial number (513-243-8941).

Regards,

Page McGirr  
Manager, Quality Systems  
GE Engine Services