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**Aerospace
Industries
Association**

OFFICE OF THE
CHIEF COUNSEL
FEDERAL AVIATION
ADMINISTRATION
200 OCT 24 P 4:00

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FAA-00-7952-45

October 24, 2000

Federal Aviation Administration
Office of the Chief Counsel
Attn: Rules Docket (AGC-200)
Docket No. 28293
Room 915G
800 Independence Avenue, SW
Washington, DC 20591

Docket No. 28293; Amendment No. 121-279, 125-35, 135-77, and 145-22

Dear Madam or Sir:

On behalf of the Aerospace Industries Association of America, Inc., I am writing to request a 60 day extension of the comment period on Docket No. 28293; Amendment No. 121-279, 125-35, 135-77, and 145-22. This will enable the affected parties to perform an in depth cost analysis of this rule.

An initial review by at least one of our members indicates that this rule as written will result in substantial costs with little commensurate safety benefit. Accurate cost estimates for the industry will require extensive analysis. Given the potential impact of the proposed rule upon the aviation industry, and the fact that any FAA concerns over aviation safety addressed by this rule would not be adversely affected by a 60 day extension of the comment period, AIA believes the requested extension is reasonable and appropriate.

Thank you for consideration of our request. We look forward to your timely response.

Sincerely,

Robert E. Robeson, Jr.

- cc: AIA-MMRC
- D. Collier, ATA
- S. Mac Leod, ARSA
- D. Roberts, AOPA
- P. de Gouttes, Airbus