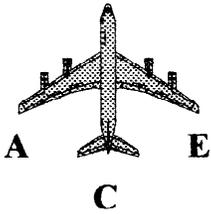


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11/27/00 09:04:00
11/27/00 09:04:00

November 27, 2000

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

Docket Number FAA- 2000-8017 - 9

The Safe Disposition of Life Limited Aircraft Part;

The proposed rule has not gone far enough. I call your attention to the requirements in FAR 45.14 which is included in this proposal. The proposal would be amended by adding the language requiring each person producing life limited parts to provide detailed marking instructions, when requested. For example the producer (Manufacturer) would state what material or methods may be used to mark the part, and where the marks should be located on that part. The producer would also state whether the part cannot practically be marked without compromising it's integrity.

During the certification of the part (life limited component), I believe that the FAA under Part 45.14 requires the producer to permanently and legibly mark that component with a part number(or equivalent) and serial number (or equivalent). Most manufacturers provide these marking instructions on their production drawing where to mark the part and the method of marking the part. Some manufacturers in addition to the part number, and serial number, also require the heat code be applied. The manufacturer and the FAA determine where the required markings are to be applied. They select an area that during normal engine operations the numbers could not become non legible do to damage or erosion. There are some cases that the manufacturer develops a repair that may remove the required numbers but provide instructions to reapply these numbers and the method and location of applying them in service bulletins.

The FAA has established a program on detecting suspected unapproved parts. The SUP Program Office is AVR-20. The form used is FAA form 8120-11. The FAA also developed an Advisory Circular 21-29B Detecting and Reporting Suspected Unapproved Parts in this document they address Identification and Registration Marking FAR Part 45. The FAA also developed an Advisory Circular 21-38, Disposition of Unsalvageable Aircraft Parts and Material. In this AC they address questionable part numbers markings and or re-identification, stamp overs or vibro etching on the data plates.

In the Advisory Circular 21-29B page #8 acceptance procedure's item #(3) states; verify that the identification on the part has not been tampered with (e. g., serial number stamped over, label or part/serial numbers improper or missing, vibro-etch or serial numbers located at other than normal location).

Advisory Circular 21-38 Disposition of Unsalvageable Aircraft Parts and Material page #3 Para b, persons disposing of unsalvageable aircraft parts, gives methods that should be used to prevent misrepresentations:

#2 Removing the original part number identification

Para e, All purchasers of aircraft parts should be on alert for the following items 1 through 6. Item #6 addresses questionable part numbers, fraudulent or suspicious Technical Standard order or FAA-Part Manufacturer Approval markings and /or re-identification, stamp overs or vibro-etching on data plate.

I am a Designated Airworthiness Representative and have discovered that in several cases where life limited parts are presented to me for export, and the permanent and legible part marking required by the FAR's are not present. The original markings that identify the part, with (part number, serial number, and heat codes), have been altered and in some case missing. What I have found during the inspection of the part, are that you may find the part number and serial number vibro-peened, but no heat code. I believe that with out at least one of the original markings you can not determine whether the part is eligible to install on a type certificated product .The marking are vibro peened and there is no documentation as to who, or when these markings have been applied to the part.

It seems that Repair Stations receive life limited parts into their facilities with these markings. The question that has to be asked , why ?. if the parts do not have any of the original markings, how does a repair station know the current identification of the part other than what the customer provides. I believe that the repair station can not determine the eligibility of the part and therefore should not allow these parts into their facility for any maintenance. If by some mistake the repair facility does not protect these marking and the part is subject to shoot peening or any other repair that may distort the numbers(by not following the instructions in the maintenance manual) then the repair facilities would be performing a non approved maintenance function. The

manufacturers do provide instructions in their maintenance manual to protect the numbers by covering them during the maintenance process.

I believe that this proposal is very good . However, it does not address all of the possible problems. Other problems with the Life Limited Parts issues are:

1. Tractability of life limited parts.
2. Repairs performed by repair stations not knowing the eligibility of the part.
3. Lack of documentation on who applied the re-identification numbers.
4. Parts with reapplied identification number in other than where the original marking where applied.
5. The manufacturers develop a procedure of applying the identification number with out FAA concurrence. (original certification of part "type design").


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DART-800217-NE