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Docket Management System
US Department of Transportation
Room Plaza Level 401
400 Seventh Street, SW
Washington, DC 20590-0001

Attention: Docket No. FAA-2000-8017 — 12

Subject: Notice Of Proposed Rulemaking, Safe Disposition Of Life-Limited Parts; Federal Register, October 2, 2000, Page 58877

Ladies/Gentlemen:

Airborne Express believes all life limited parts should have records which account for each flight cycle or flight hour from the day the part was manufactured. These records should be available when the part is installed on an airplane, sitting in stock, or at a repair shop. This record, be it a hard card, computer record, or permanently marked on the part, is required to be accurate per Section 43.12. If every life-limited part is required such a record, persons who install a part should have adequate information to determine a part's current life status. Airborne Express does not believe that enforcing rules on the person who removed the part will result in a safer airplane fleet. Section 43 should require that the status of a life-limited part be known when returning the part to service. If a satisfactory status is not provided or known, then the part should not be returned to service. The following comments incorporate this belief and also attempt to simplify the rule.

The Applicability paragraph of proposed Section 43.1, paragraph (c) uses the words "removes, segregates, or dispositions" which are standard practices during repair (maintenance) of aircraft parts. These words complicate compliance. We suggest replacing these words with "performs maintenance." This rule should only apply to certified persons, as implied with the suggested wording. Following is the suggested paragraph (c) of section 43.1:

Sec. 43.1 Applicability.

* * * * *

(c) This part applies to each person who performs maintenance of a life-limited part from a type-certificated product as provided in Sec. 43.10.

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Proposed Section 43.10, paragraph (b) is worded so that the person who removes the part may be subject to enforcement when that person may not know or need to know the status of the part. There may be processes in place in an organization that controls the life-limited parts and the remover does not get involved in the process. This rule should define that each life-limited part must go through a process to control expired life-limited parts. The rule should not be specific on who does what. Airborne Express suggest rewording paragraph (b) to: *After [the effective date of the final rule], an approved method must be in place to control each life-limited part on a type-certificated product. The method must prevent the part from being installed after it has reached its life limit. Approved methods include:*

Proposed Section 43.10, paragraph (b)(ii) of the NPRM states that the part must be stored separately from serviceable parts. This should not be required if the part has not exceeded its life limit. The proposed rule does not differentiate between serviceable life-limited parts and expired life-limited parts. Airborne Express recommends that no matter what method of control is used, all expired life-limited parts should be segregated. Airborne Express suggests moving paragraph (b)(1) and (b)(ii) into a separate paragraph (d): *A life-limited part that has reached its life limit or its current life status is unknown must be segregated under circumstances that preclude its installation on a type-certificated product. These circumstances must include, at least--(1) Ensuring the part is stored separately from serviceable parts and, (2) Ensuring the part receives the appropriate final disposition.*

Proposed Section 43.10, paragraph (b)(3) is not a method of control. It should not be listed as one of the methods of control. Destroying the part is the final disposition of the part. Suggested paragraph (d) requires the part to be disposed of properly. Advisory Circular No. 21-38 provides guidance for the appropriate final disposition of the part. Airborne Express suggests removing paragraph (b)(3).

Proposed Section 43.10, paragraph (b)(4) repeats what is stated in paragraph (b)(2) except for the requirement for a "permanently and legibly" mark. If someone chooses to use the method of marking life status on life-limited parts, the marks should be permanent and legible. Therefore, Airborne Express suggests removing paragraph (b)(4).

Proposed Section 43.10, paragraph (c) is unclear of its intent. Airborne Express interprets that the intent of paragraph (b) is to ensure the part is controlled while being repaired. A part may move from one person/operator to another person/operator. It should be required that the individual/company performing the return to service should be responsible for ensuring that the life status is known. If a satisfactory status (historical record) is not provided or known, then the part cannot be returned to service. Airborne Express suggests to reword paragraph (c) to: *Each person who returns a life-limited part into service must ensure that the part is controlled using one of the methods in paragraphs (b)(1) through (4).*

The following is the suggested Section 43.10 taking into account the comments on the previous page:

Sec. 43.10 Disposition of life-limited aircraft parts.

* * * * *

(b) After [the effective date of the final rule], an approved method must be in place to control each life-limited part on a type-certificated product. The method must prevent the part from being installed after it has reached its life limit. Approved methods include:
  (1) Keeping a permanent record of the serial number and current life status of the part.
  (2) The part may be permanently and legibly marked, if practical, to indicate its life status. The life status must be updated each time the part is removed from service. Unless the part is permanently removed from service, this marking must be accomplished in accordance with the manufacturer's marking instructions, in order to maintain the integrity of the part, as required under Sec. 45.14 of this chapter.
  (3) If it is impractical to mark the part, a tag may be attached to the part to include the life status. The tag must be updated to reflect life status each time the part is removed from service.
  (4) Any other method approved by the Administrator.

(c) Each person who returns a life-limited part into service must ensure that the part is controlled using one of the methods in paragraphs (b)(1) through (4).

(d) A life-limited part that has reached its life limit or its current life status is unknown must be segregated under circumstances that preclude its installation on a type-certificated product. These circumstances must include, at least--
  (1) Ensuring the part is stored separately from serviceable parts, and
  (2) Ensuring the part receives the appropriate final disposition.

Regards,

Robert J. Zitney

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