

November 28, 2000

Docket Management System (DMS)  
U.S. Department of Transportation  
Room Plaza Level 401  
400 Seventh Street SW  
Washington, DC 20590-0001

Docket NO.: FAA-2000-8017

SUBJ: Safe Disposition of Life-Limited Aircraft Parts

Dear Ladies and Gentlemen;

Below you will find my comments of your NPRM regarding the above subject.

**43.1 Applicability**

1. The proposed wording is contradictory to what is stated as the intent on page 7 of your NPRM.
2. Addition of this subpart (c) is in direct contradiction of subpart (b) in that certificated parts are utilized quite frequently on aircraft that have experimental certificates such as amateur built experimental. There is nothing that does not allow the reuse of these certificated parts on aircraft certificated in other categories (normal/utility/transport). How do you justify stating 43 does not apply then in the subsequent proposed subpart state that it does?

**43.10 Disposition of Life-Limited aircraft parts**

1. This whole NPRM is redundant to the existing FAR's in that life limited parts are currently sufficiently regulated and controlled under parts 21 through 121, in addition to the manufactures and Type Certificate holders limitations sections of their manuals and under the requirements for Instructions for Continued Airworthiness.
2. Your estimates regarding the frequency of performing the requirements of this NPRM are sadly skewed. In our company as owner /operators and a major repair station we handle in excess of 5000 actions annually of life-limited, time controlled aircraft components. We know for a fact that your estimate of 5 minutes for each recordingkeeping action is flawed. On the average it takes approximately 15 minutes at a minimum to take care of the existing documentation and recordkeeping, by addition of the requirements that exist within this NPRM an additional 10 minutes is more realistic. Currently we have two (2) full time employees that do nothing but recordkeeping updates. We average an expenditure of over 1250 man hours annual as the rules exist. With the additional requirements as proposed we would expend another 833 man-hours to meet these new requirements. Your total frequency and cost burden is grossly in error. Assuming that it will take us approximately 10 minutes additional as proposed to properly perform the recordkeeping, marking and disposition of life-limited parts our cost would be increased annually by \$45,815.00, not \$1200.00 as your NPRM would suggest.
3. In regards to your additional requirements of marking and/or destroying the parts. We currently "Red" tag all non-airworthy parts and segregate them. We then notify our customers of the action taken and request disposition instructions. Do to the nature and/or age of some of these items they can be of historical or sentimental value. If we were to destroy or deface these articles under your proposed guidelines we would be in court paying large attorney fees and compensation to our customers for the wanton destruction of their property. Are you going to re-write the numerous laws and previous court cases to ensure that by acting under your mandated regulations we will not be liable?

4. By your own admissions in the NPRM the expected results directed by this legislation are “SMALL”. Why are we wasting taxpayer money and time that could be better expended on enforcement of the existing FAR’s as currently written.
5. Lastly every Certificate of Airworthiness with the exception of Special Certificates of Airworthiness have printed on the face of them the statement that the certificate is only valid if the maintenance, preventive maintenance and alterations are performed in accordance with FAR 21, 43 and 91. Proper manning of the FSDO’s will ensure compliance, compliance will ensure safety (FAA MANDATE).

Sincerely  
Columbia Helicopters, Inc.

Jack R. Butler  
Asst. Chief Inspector, QC