



6 January 2001

Electronically Submitted

Docket Management System (DMS)
U.S. Department of Transportation
Room Plaza Level 401
400 Seventh Street SW
Washington, DC 20590-00 1

Attention: Docket No. "FAA-2000-8017" -

Dear Sir/Madam:

COMMENTS:

1. The effectivity of the Part 43 proposed rule is stated as applicable to parts "Removed" after the effective date of the rule. This is virtually impossible to monitor or enforce, as there is no requirement and little practice in the industry to record and effectively track the removal date of a component.

There are many components in inventories world wide that are in this condition and may have no record of removal date attached. However they will be overhauled or repaired someday and returned to service (after the effective date), and perhaps placed on a shelf to be sold at a much later date.

It is a common practice in the industry to hold repairable "Cores" until it is economically desirable to repair/overhaul it (perhaps years). There would be no way to know if the rule should have been complied with for that component. The new rule 43.1 (c) does not adequately address this condition. It only addresses components "Removed" after the effective date and not products that "Re-enter Service" after the effective date.

I feel it would better serve the interest of safety and the intent of the rule if the rule was also applicable to all Life Limited products that are "Approved for Return to Service" after the effective date. This places a responsibility on the Repair Facility that is Approving the component for Return to Service, to acquire the "Life Status" prior to approving the component for return to service.

2. I believe that "Life Status" should be an additional requirement (when applicable) in Part 43 Sec 43.9 to be included in the information required on the maintenance release form (usually FAA Form 8130-3).

Sincerely,

Lee H. Thomas
Manager, Quality Assurance