

Comment #1.

The referenced FAA NPRM addresses the safe disposition of life limited parts upon their removal from airplanes. The proposed change to FAR 43.10 requires that life limited parts be either segregated, with the records of their "life status", or stored with serviceable parts, provided that their "life status" can be either marked on each part or marked on a tag that is attached to each part. We believe that the safe disposition of parts should also be extended to include certain damage tolerant parts that may be transferred between airplanes. These damage tolerant parts will have mandatory inspection requirements specified in the Airworthiness Limitation Section of the manufacturer's Maintenance Manual or Instructions for Continued Airworthiness. Keeping an accurate record of their service history is necessary in order to ensure that they are inspected at or before their mandatory inspection intervals.

This change would make the proposed NPRM change to FAR 43.10 consistent with the current FAR 45.14, which addresses both life limited parts (a part for which a replacement time ...is specified...) and damage tolerant parts (parts for which ... an inspection interval ...is specified...).

The proposed NPRM change to FAR 45.14 would now need to address both life limited parts and damage tolerant parts.

Comment #2.

We also believe that the proposed text for FAR 43.10(b)(ii)(4) is redundant and should be deleted.

The issues addressed in (b)(ii)(4) are:

1. Parts may be marked, if practical.
2. The status must be updated each time the part is removed.
3. Markings must be per manufacturer instructions.

All of these are all addressed in (b)(ii)(2).

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