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FAA-00-8017-32

DEPT. OF TRANSPORTATION

Docket No. FAA-2000-8017 Life Limited Parts

01 JAN 30 PM 2: 32

### Comments from Rolls-Royce plc

While we fully support the initiative to reduce the number of life expired parts being used in service, we believe that the proposal to permanently mark, or tag, a life limited part to indicate its used life status could prove counter to the intent of the proposal. The following explains our concerns for engine critical rotating parts:

- It should be a fundamental objective to minimise the marking of critical rotating parts yet the proposed rule would actually encourage this practice. Even if the manufacturer were asked to identify a 'dead' zone on which markings were acceptable, the proposal will inevitably result in the indiscriminate positioning of vibromarks etc. (due purely to operator error or when space is limited) which are likely to compromise the airworthiness of the component.
- Such a large scale exercise will introduce additional opportunities for error particularly in the incorrect marking of parts (transposition of numbers etc.). This concern would be exacerbated should the marking ever be erroneously considered as the prime record of the component's life.
- Since the part-life marking of a part is not a requirement on those who remove the part (eg. 43.10 (b)(1)), then its status will not necessarily be recorded if the part were, for example, to be quarantined. On removal from quarantine (when perhaps a life increase has been established) the part might therefore carry a cyclic life far lower than its actual life and provide the opportunity for further errors that could lead to life exceedances.

We cannot therefore support the proposal to mark such life-limited engine parts and consequently suggest that improvements in other areas, such as documentation control, might be more appropriate.

M C Sanders  
(on behalf of Rolls-Royce plc)