

Record of Informal Communication on a Rulemaking Activity
January 26, 2001
Meeting at Suite 703
1707 H Street, NW
Washington, DC 20006

Rulemaking activity addressed

Safe Disposition of Life-Limited Aircraft Parts, 65 Federal Register 58877 (October 2, 2000).

List of participants

Jason Dickstein, President, Washington Aviation Group

Al Michaels, National Resource Specialist for Helicopters and Parts, Federal Aviation Administration

Summary of discussion

The subject of the meeting was the Life Limited Parts proposed rule issued as a proposal by the FAA in October 2000. Michaels and Dickstein discussed an alternative proposal developed by aviation industry personnel.

The proposal would serve as an alternative that the industry personnel intend to submit jointly to the FAA in response to the NPRM. Dickstein sought Michaels' comments on the proposal, in order to make sure that the industry proposal meets the requirements of the FAA and the public interest.

Conclusions

Michaels suggested alternative ways of approaching the Life-Limited Parts issue that would be less objectionable to the public interest than the initial draft. Dickstein agreed that Michaels' proposals were sound and announced an intention to implement them in a draft to be shared with other interested parties in the industry before being submitted to the FAA.

Michaels agreed that the proposal advanced by Dickstein, which would divide the duties associated with life-limited parts among those in the industry in the best position to meet the duties, seemed to be a workable solution to the life-limited parts issue. In particular, the proposal would impose a burden on the owner of a part at the time of removal to properly record relevant information, and to forward such information to parties that would need the information. Installers of life-limited parts would then be required to rely on such records where they were made available, and would be explicitly precluded from

installing a life-limited part without appropriate assurances concerning the part's life status.

Michaels did not agree that the FAA would accept or reject any proposal from industry.