

Record of Informal Communication on a Rulemaking Activity
January 29, 2001
Telephone Conference

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

Sarah MacLeod, Executive Director, Aeronautical Repair Station Association

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

Summary of discussion

The subject of the phone conversation was the Life Limited Parts proposed rule issued as a proposal by the FAA in October 2000. MacLeod, 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 and MacLeod sought Michaels' reaction to certain limited details of the proposal, in order to make sure that the industry proposal meets the requirements of the FAA and the public interest.

Results

Michaels agreed that a regulation that established objective standards would be preferable to one that was based on the intent of a person who removes a part, because that intent could be difficult to judge.

Dickstein and MacLeod agreed that Michaels' advice was sound and announced an intention to implement the advice in a draft to be shared with other interested parties in the industry before being submitted to the FAA.

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