

Response to FAA Docket # FAA-2000-8017

This response does not directly address the specifics of this docket regarding the safe disposition of life-limited parts. It does, however, provide important information regarding the identification and traceability of life-limited parts, virtually all of which are serialized. It was felt this office of the FAA should be fully aware of the Spec 2000 initiative that is in full production across the industry because it relates to necessary data that should be the key in any safe disposition of life-limited parts. Possibly this proposed rulemaking should be broadened out to include cradle-to-grave traceability as well as safe disposition of these parts.

Spec 2000 Permanent Bar Code ID is the foundation of serialized part identification. It defines how a serialized part is labeled with a unique serial number that will never be duplicated, a universal 'social security number' that works across the world. That Spec 2000 Permanent Bar Code ID has been published since 1992. It has been adopted by United Airlines and other major airlines, Boeing, Airbus, Bombardier, seven jet engine manufacturers, and approximately 1000 other suppliers in the aerospace industry. Permanent Bar Code ID, this universal social security number, is then used to meet the industry's Spec 2000 Traceability Standard. One of the outcomes of this Traceability standard might be a central database that identifies when parts have been scrapped. With the advantages of the Internet and web-based databases, it would be very easy to check if a used part they were about to buy was already in the scrap database. This concept is not foolproof but it offers a significant improvement in the integrity of the data and provides a significant new opportunity to avoid an unapproved parts situation.

Feel free to contact me for further information.

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