



February 5, 2001

U. S. Department of Transportation Dockets
Docket No. [FAA-200-8017]
400 Seventh Street SW
Room 401
Washington, DC 20509

RE: Notice of Proposed Rulemaking, Docket No. FAA-2000-8017; Safe Disposition of Life-Limited Parts

The National Air Transportation Association (NATA) represents the interests of over 2000 aviation businesses nationwide, including repair stations operating under 14 CFR Part 145, other maintenance facilities, and Part 135 on-demand air charter operators which will be affected by the Notice Of Proposed Rulemaking (NPRM). The Association is concerned that the vagueness of the proposal will lead to inappropriate application of this rule.

NATA offers the following specific recommendations.

Issue:

It is essential that the rule clarify that the routine removal and re-installation of parts is not affected by this rule and that the removal of a life-limited component with the intent of re-installation of that component does not require any special documentation, marking or segregation. Paragraph (c) of section 43.10 requires that parts must be segregated "other than for immediate installation on a type-certificated product." The Association is concerned that this does not allow for routine maintenance-related removals and re-installations.

Recommendation:

NATA recommends amending paragraph (c) of section 43.10 to read:

Each person who removes a life-limited part from segregation as identified in paragraph (b)(1) of this section, other than the removal and re-installation of life-limited parts on the same type-certificated product or removal for immediate installation on a type-certificated product, must ensure that the part is controlled using one of the methods in paragraphs (b)(2) through (6).

Issue:

The preamble identifies the role and responsibilities of a technician who is operating under an air carrier or repair station certificate and references paragraph (b) (6) of section

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43.10. This provision needs to be included in the text of the applicability of the rule. While the certificate holder may have an acceptable program for the segregation and marking of the life-limited part, the rule does not change the responsibility of the technician who is employed by the certificate holder. Paragraph (b) states that each person who removes a life-limited part from a type-certificated product must ensure that the part is controlled using one of the methods in paragraphs (b)(1) through (6) of this section. The proposal does allow that approved methods include any other method approved by the Administrator (b)(6). However, paragraph (b) is addressed to the “person who removes a life-limited part”; therefore, the responsibility for the segregation, marking and disposal of the part will still reside with the technician removing the part.

Recommendation:

The Association recommends that Paragraph (b) of section 43.10 be amended to create an exception to (b) (1) through (6) and add a subparagraph (b) (7) which reads:

- (7) Any air carrier or repair station program which has a method for handling life-limited parts that provides at least the same level of safety as (b)(1) through (b)(5), that is approved by the Administrator.

The Association looks forward to continuing to work with the Agency to resolve these issues.

Sincerely,

Andrew V. Cebula
Vice President