

AIA Comments: Proposed Rule Regarding the Modification of Contents in Airworthiness Directives

REFERENCE: Notice of Proposed Rule Making (NPRM), Docket No. FAA-2000-8460, Federal Register Date January 12, 2001

Section 39.15

Please modify the sentence: *If that change affects in any way your ability to accomplish the actions required by the airworthiness directive...* to: *If a change affects in any way your ability to accomplish the actions (or alters existing approved actions) required by the airworthiness directive...*

These changes clarify the requirement to obtain alternate means of compliance for those incorporating airworthiness directives released prior to this rulemaking. The sentence as originally written implies it is only applicable for new airworthiness directives.

Section 39.21

Please add reference to FAR 21.197 (defines the use of Special Flight Permits).

This will provide additional guidance to the operator regarding Ferry Flights.

Section 39.15

It may not be advisable to automatically make the statement the AD applies to changed products. This may take away some needed considerations of affected configurations during the formulation of the AD. By this statement, I am saying that there may be a propensity to think the responsibility of consideration of changed configurations can just be thrown to the owner/operator. There are some very complex changes to products on airplanes that cannot be reliably delegated to field operations FAA and maintenance personnel. Those complex changes are the very reasons for the omission of the applicability statement to changed products referenced in the Proposed Rule as having historically occurred on AD's. It is frequently necessary to develop AD's that adequately cover known changes to airplanes. Having this automatic responsibility statement may well promote a lack of effort in properly creating the AD's needed to cover various configurations.