

# TRANSPORT AIRCRAFT TECHNICAL SERVICES COMPANY, INC.

*An Aircraft Remarketing Services Company*

April 9, 2001

Docket Management System

U.S. Department of Transportation

*Via The Internet* <http://dms.dot.gov>

Subject: Proposed Changes to 14 CFR Part 39

Reference: Docket Number FAA 2000-8460

Dear Madam or Sir:

I have been reviewing Airworthiness Directive Compliance Records for both U.S. and non-U.S. registered aircraft since I received my Airframe and Powerplant Certificate in 1955, my first Inspection Authorization in 1966 and my appointment as a Designated Airworthiness Representative – Maintenance – in 1983. I served on the Aircraft Maintenance Recordkeeping Rulemaking Advisory Committee (ARAC). There are many problems with the current Airworthiness Directive development and enforcement systems. Many “small aircraft operators” do not understand the requirement to comply with them. Compliance by many large aircraft commercial operators is so non-existent we sometimes wonder how the NASIP teams do not detect it. I do not, however, believe that the proposed changes will improve the situation – it will merely place some important words in a 14 CFR part (39) that many people do not know exists.

Specifically I disagree with the statement – *International Compatibility*. § 4.2.2 of Annex 8 of ICAO International Standards and Recommended Practices – Continuing Airworthiness Of Aircraft – requires the State of Design to provide specific information to the State of Registration in order for them to maintain the Continued Airworthiness of foreign designed – manufactured – aircraft on their registry. Today’s Airworthiness Directives are a “stand alone” regulatory document that describes the problems and, in most but not all instances, the remedies. Placing certain requirements – conditions – in 14 CFR 39 imposes *an FAA regulatory knowledge requirement* on foreign operators of U.S. designed/manufactured products. **And, for all operators, it does not enhance safety.**

Sincerely,

TRANSPORT AIRCRAFT TECHNICAL SERVICES COMPANY, INC.

**Transport Aircraft Technical Services Company, Inc.**

F. James Helms  
President