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TO: 9-NPRM-CMTS at ARM
Subject: Docket No. 28903

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28903

Dear FAA Chief Counsel;

As a private general aviation pilot the language in the proposed rule changes in the procedure for obtaining changes in type certification of certified products concerns me.

I understand why some changes are necessary in the rules for the planes that are used for commercial air transport. Some of these planes bear little resemblance to their original certified configuration, due to the extreme changes that are sometimes made to them over the life of their certification. When you are using these planes for commercial air transport, there needs to be additional safeguards to make sure that old certifications aren't abused in an effort to bypass current safety standards.

The language used in this proposed rules change however could be construed to apply to the many STCs made available to the general aviation community through both the original manufacturers, and by third party entrepreneurs who have come up with a way of making our general aviation aircraft better and safer planes to fly. Even though they may still not meet current day new certification standards, many of these STCs make our planes much better, more efficient, and safer planes than what they are without them. If the manufacturers of these STCs are forced to bring them up to what current day standards would be for someone starting from scratch with a whole new airplane design, many of these STCs will never see the light of day due to the increased costs, and the limited market available to recoup these costs. If this happens, it will have a large negative effect on the safety of the older small aircraft, which the majority of the general aviation aircraft fleet is made up of.

I urge you to adopt changes in the wording of these proposed rules changes that will promote the continued development of STCs that while not necessarily bringing our older aircraft up to current day new certification standards, will never the less greatly increase the usability and safety above what it is in its current configuration. Thank you for your consideration of my comments on this issue.

Dustin S Paulson