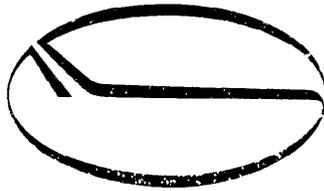


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FAA-01-8994-111

Air Transport Association

August 7, 2000

Federal Aviation Administration
Office of Chief Counsel
Attention: Rules Docket (AGC-200),
Docket No. 28903
Rm. 915G
800 Independence Avenue
Washington, DC 20591

10

2000 AUG 14 A 3:54
OFFICE OF THE
CHIEF COUNSEL
RULES DOCKET

Subject: **Type Certification Procedures for Changed Products,**
65 Fed. Reg., Vol. 110, June 7, 2000

Reference: ATA Memo No. 00-AE-053, June 8, 2000

Ladies/Gentlemen:

FAA adopted amendments to Part 21 and 25 Federal Aviation Regulations regarding the certification of changes to type certificated products. The amendments affect applications for changes that are proposed, after December 9, 2001, to be accomplished through either an amended type certificate or a supplemental type certificate. Since the amendments introduced regulatory aspects that were not addressed in the associated proposal, FAA has requested additional public comments.

Two member airlines of the Air Transport Association provided comments to the amendments, which are attached. Neither voices an objection to the rules.

We appreciate the opportunity to contribute comments to this rulemaking and thank you for your consideration of these views.

Sincerely,

Joe White
Director, Aircraft Systems Engineering

Cc: Randall Petersen, Certification Procedures Branch, 202-267-9583
AEC

From: Mark Boes [via e-mail]

Sent: Friday, July 21, 2000 10:59 AM

To: Joe White

Cc: Chuck Williams

Gerry Burns

Janice Tedford

Lester Wagner

Lisa Gibbs

Marilyn King

Mike Keller

Ray E Morgan

Rick Hardmeyer

Rick Yorman

William Bartelt

Subject: A/W ENGINEERING MEMO 2000-053

Subject: Type Certification Procedures for Changed Products.

Attention Joe White - ATA

American Airlines has reviewed the Final Rule and agrees with the FAR changes. This should not have an impact on American Airlines DAS Program.

Regards

M. H. Boes

Acting Mng. Dir. A/C Engineering

American Airlines

TUL

July 19, 2000

Mr. Joseph W. White
Director, Aircraft Systems Engineering
Air Transport Association of America
1301 Pennsylvania Avenue, NW, Suite 1100
Washington, D. C. 20004-1707

Subject: ATA Memo 00-AE-053 Type Certification Procedures for Changed Products

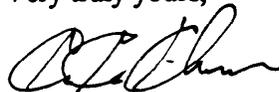
Dear Mr. White:

The Amendments adopted in the subject ATA memo have an effective date of June 7, 2000. Mandatory compliance dates for these amendments are December 10, 2001 for transport category airplanes and December 9, 2002 for all other category aircraft and engines and propellers.

These amendments will principally affect the airframe manufacturers who develop a derivative aircraft. In the past, the regulations allowed developing derivative aircraft or STC's to mature aircraft using the original certification basis. Amended Part 21.19 will require derivative aircraft to apply for a new type certificate if the Administrator finds that the proposed change in design, power, thrust, or weight is so extensive that a substantially complete investigation of compliance with the applicable regulations is required. Also, amended Part 25.2 will require certain listed FAR's to be met if passenger capacity exceeds original maximum capacity.

These amendments will add cost to the derivative aircraft when the adopted criteria dictate new or additional certification compliance. It will, however, provide an aircraft that meet the current certification standards rather than predecessor aircraft standards. As a result, future derivative aircraft will have enhanced safety, and thereby, provide an improved vehicle to the traveling public.

Very truly yours,



G. G. Gibson, Director
FAA/ATA Liaison and
Quality Assurance