

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW.
Washington D.C. 20590-0001

134960
Docket Number: FAA-2001-10047 - 4

DEPT. OF TRANSPORTATION
COMMUNICATIONS

01 JUL 23 PM 1:02

I am opposed to proposed Section 91.1109 as it is written. The language of this proposed section eliminates all inspection options as currently provided under FAR 91.409 and forces all operators to utilize the AAIP format.

Specifically, the proposed 91.1109 (a)(1) mandates both 'instructions' and 'procedures' to be written out, making mute any subsequent language referencing manufacturer's programs, or other continuing airworthiness programs currently available to the industry. Proposed 91.1109 (b) gives the FAA total control of the program as it stipulates the program 'must' be submitted and approved by a local FSDO.

Post 1981 aircraft are provided with both inspection programs and airworthiness limitations by their manufacturers. To this end the aircraft manufacturer provides guidance and forms to adequately inspect the aircraft. Furthermore, after-market installations require 'instructions for continued airworthiness' be supplied to the end user as a condition of filling out FAA Form 337 properly. This requirement is also mandated of anyone providing TSO parts to the industry by the TSO. All these guidance, forms, and instructions are meticulously scrutinized and tracked as a matter of routine by conscientious aircraft maintenance personnel who can demonstrate compliance to FAA inspectors whenever requested.

Furthermore, the preamble to the proposed rule gives **no substantive justification** for now requiring the design and approval of forms, specific to interpretation by a FSDO, as the **ONLY** means of providing for the inspection of an aircraft operated under fractional considerations (or any rules for that matter.)

Rules currently in existence under Part 91 and Part 135 (9 seats or less) provide for use of manufacturer's forms exclusively, with consideration for after-market equipment and life limited items under an enhanced 'tracking systems.' These are augmented with well documented maintenance activity entries into the aircraft records. The current rules even provide for the Administrator to intervene if it can be demonstrated that there is justification.

I respectfully submit that the proposed Far 91.1109 be rewritten to provide for reference to instructions already provided (such as UNS -1 Manual #34-60-12, Maintenance Check Procedures, page 501), forms already in existence (such as Beech Phase 1 Inspection, Chapter 5-20-00, pages 7 through 24) and documentation already recognize as adequate, rather than simply mandate (without justification) that aircraft can no longer be inspected or maintained without forms from a FSDO, and their prior 'approval.'

Respectfully Submitted



Richard F. Wussler
A&P 4126124