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UNITED AIRLINES

Maintenance Operations

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FEDERAL AVIATION ADMINISTRATION

Federal Aviation Administration
Flight Standard Service
800 Independence Ave., SW
Washington, DC 20591

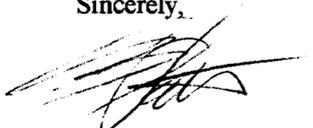
Attention: Mr. Frederick Sobeck
AFS-304, Aging Airplane Program Manager

Subject: Proposed AC 120-AAR Aging Airplane Inspection and Records Review

Dear Mr. Sobeck,

The reference proposed AC provides guidance about aging airplane inspections and records reviews that are to be accomplished to satisfy the requirements of the "Aging Airplane Safety" final rule. We only concur that the contents of the proposed AC are consistent with the text of the "Aging Airplane Safety" rule. We still strongly disagree on applicability of the "Aging Airplane Safety" to Part 121 operators. As we have stated before, it provides no additional value for enhancement of safety, imposes redundant requirements and will be unduly burdensome.

Sincerely,



Clay Satterlee
Program Leader Airworthiness - Systems

cc: W. Evans, United Airlines - SFOEG