

We agree that a continued airworthiness program must exist to ensure the safe operation of aging aircraft. However, we believe that to imply a requirement as such would be excessive for some aircraft.

This is our reasoning:

1. Some Type Certificate Holder of multi-engine aircraft used in commercial operations already have Continued Airworthiness Programs to ensure safe operation of their aircraft as they age. Gulfstream Aerospace for example has developed an Aging Aircraft Maintenance Program because many of their aircraft are reaching their major life limits. Raytheon Aircraft Co. also has stringent complete fuselage and wing X-Ray requirements that fall on 4, 8, 16, and 24 year intervals.

2. Who is going to develop all of these aging aircraft maintenance programs? Operators? Principle Maintenance Inspectors? If so, who is responsible for the type of data used to develop it. Should not engineers be involved? This requirement should be imposed on manufacturers. Since they have the data required to implement these requirements.

3. This new requirement is inconsistent with current 14 CFR 21.50, 23.1529, 25.1529, 27.1529, 29.1529, 31.82, 33.4 and 35.4. Manufacturers are responsible for continued airworthiness instructions - not operators or PMI's.

4. The cost and time involved in developing these maintenance programs would make it cost prohibitive to continue operating certain aircraft. It would be more efficient to go to the Manufacturers and impose the Aging Aircraft Requirements in the existing 14 CFT 21.50.

We understand that there are aircraft used in commercial operations that no longer have a Type Certificate Holder or the Type Certificate Holder has not provided sufficient instructions for continued airworthiness with respect to aging aircraft. In these situations, operators and their respective PMI's should develop a custom program for the continued operations of these aircraft. Furthermore, an Advisory Circular should be written to address the issue of Aging Aircraft and a standard format for these Maintenance Instructions.