

05/19/2003 10:48 AM

To: Beverly J Sharkey/AWA/FAA@FAA
cc:
Subject: NPRM on False and Misleading Aircraft Parts Statements

Good day:

I applaud the FAA for addressing this issue. It should provide additional enforcement tools against those who operate too closely to the edge of legality in the aircraft parts business.

One topic that is implied, but, in my view, not addressed with sufficient clarity is the marketing representations made by individuals or entities that a part has been "STC approved" or is "STC'D." This claim, while perhaps technically true, implies that the part can be installed on the aircraft mentioned. In the broadest sense, almost anything can be installed on any aircraft on a one-time basis if the installation is approved by STC. The advertising implication is that a one-time approval is somehow a guarantee of additional similar approvals which may not be true since each installation is unique. Moreover, this marketing technique often becomes and end run around the safe guards of the PMA process by providing the unapproved materials to be used in the STC modification. The clear intent is to provide products for installation on TC items when such products are unapproved.

Here are some links to this type of product and advertisement:

<http://www.cubcrafters.com/cc/products/850Tires.asp>
<http://www.cubcrafters.com/cc/products/TundraTires.asp>
http://www.aeronautx.net/Aerotronx/content/aert_05001.htm
http://www.blrvgs.com/news/205_212STC_PR.htm
<http://franklinengines.com/stinson.cfm>
http://www.paravion.com/products/monitor_mounts_hoods/monitor_mounts_hoods.htm
http://www.blrvgs.com/aircraftpages/cessna_vortex.htm
<http://www.ishams.com/p1000.html>
<http://www.dallasairmotive.com/news/preleasenewfilteras350.htm>
<http://www.avionicswest.com/450fuelscan.htm>
<http://www.aerosafe.net/page4.html>

In my view, if a product is represented as approved for installation on a type certificated or TSOA product, the advertiser should be required to furnish as a part of the advertisement an image of the actual document that approves that part. For PMA products this would be the page of the PMA supplement where the PMA is granted.

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