



May 20, 2003

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 7th Street S.W.
Washington, DC 20590-0001

Subject: Docket No. FAA-2003-14825; Notice No. 03-06

The New Piper Aircraft, Inc. offers the following comments to the advanced proposal to revise 14 CFR Part 21.183(d):

- 1) The New Piper Aircraft, Inc. supports a possible revision to 14 CFR Part 21 that requires a person to hold a TC, or a license to use a TC, and a production approval to be eligible for a standard airworthiness certificate on new aircraft manufactured in the United States.
- 2) The New Piper Aircraft, Inc. supports a possible revision to prohibit the serial production of aircraft that is currently allowed under the requirements of 21.183(d) and, supports the proposed wording clarifying that 14 CFR 21.183(d) only applies to used aircraft (surplus military and used aircraft that have not had their airworthiness status maintained).

Piper's rationales in support of these changes to the rules are:

- 1) The FAA's policy of allowing an individual to use design data that is not legally obtained puts the public at risk, as the "type design" being used to determine eligibility for airworthiness may be obsolete or superseded. The New Piper Aircraft, Inc. has a policy not to divulge "type design data" and therefore, any data used is suspect.
- 2) The current rules allow for any builder to obtain airworthiness certificates without any knowledge or technical expertise regarding special processes or procedures required to meet type design and consequently, there exists no assurance that the product meets an acceptable level of safety. The FAA puts the public at great risk allowing this kind of activity.
- 3) Under the current rules the builder is not held responsible for Continued Operational Safety;
- 4) Under the current rules the builder is not held responsible for supporting the Instructions for Continued Airworthiness;
- 5) Under the current rules the builder is not responsible for supporting accident investigation;
- 6) Under the current rules the original equipment manufacturer/TC holder is held responsible for all liabilities arising from the builder's acts of negligence;
- 7) Under the current rules there are no provisions or requirements defined for retention of records by a builder obtaining airworthiness certificates under 14 CFR 21.183(d);



If you have any questions, please contact me at (772) 299-2497.

Respectfully,

ORIGINAL SIGNED

Albert "Jack" Mill
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