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May 11, 2004

Document Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building, Room PL-401
Washington, DC 20590

DOCKET NUMBER FAA-2003-16685

Dear Sir or Madam:

While the ODA proposal may have many things that would be beneficial to both the Federal Aviation Administration (FAA) and the aviation industry, Chromalloy Gas Turbine Corporation is not able to support the proposal at this time. There is nothing in the proposal that indicates the FAA has coordinated the proposal with the JAA, EASA, or any other aviation regulatory body to insure the world wide acceptance of data created by an ODA. Nor have conversations with FAA officials provided any such assurances.

Chromalloy and many other companies have spent years working with the JAA and various NAAs to gain acceptance of FAA DER approved data. Without some assurance that this proposal has the support of other regulatory bodies it is not in our best interest to support the proposal. This is certainly an area that requires harmonization for the good of the industry. Until that happens and until such time as there are assurances from the aviation regulatory bodies that there will be universal acceptance of data and products produced by an ODA Chromalloy recommends that the FAA take no further action on the proposal.

Sincerely,

Thomas J. Howard