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Federal Aviation Administration
Aircraft and Airport Rules Division
ARM-200
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Title 14 Code of Federal Regulations Part 21 Subpart M requires that the the DAS holder be the applicant for the DAS Supplemental Type Certificates project. The proposed rule change Part 183 Subpart D does not have equivalent requirements, which can create several issues for the FAA.

- 1) The applicant for the ODA project could be any company or private individual it does not need to be the ODA.
- 2) The applicant for the ODA project could be located in a different geographic region from the ODA, including country.
- 3) The applicant is responsible for compliance with Title 14 CFR Part 21 Subpart B, therefore oversight of the type design data for the ODA becomes extremely difficult.
- 4) Allowing the applicant for an ODA project to be any company or private individual would not be compliant with the requirements of Title 14 CFR Part 21.
- 5) The ODA could approve type design changes for existing STCs owned by a different company or individual which have “or later FAA approved” listed on the STC, without the cognizant ACO being involved or aware.