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U.S. Department of Transportation
Federal Aviation Administration
Aircraft and Airport Rules Division
ARM-200
800 Independence Avenue
Washington, D.C. 20591

Subject: NPRM
Docket: FAA-2003-16685

Proposed Title 14 Code of Federal Regulations §183.49 (c)(1) and §183.49 (c)(3) are redundant. In the process of approving technical data one must make compliance findings with airworthiness standards.

Proposed Title 14 CFR §183.49 (c)(1)&(3) are redundant to §183.29. Title 14 CFR §183.29 allows for certain FAA Designated Engineering Representatives (DER). An FAA DER can approve data, changes to approved data and make compliance findings to airworthiness standards. Therefore, to allow the ODA to perform the same functions will in effect double the FAA's workload, by requiring DER oversight and ODA oversight.