



May 19, 2004

Docket Management System
U.S. Department of Transportation
Room P1-401
400 7th Street S.W., Nassif Building,
Washington, DC 20590-0001

Subject: **Docket No. FAA-2003-16685); Notice No. 03-13**

The New Piper Aircraft, Inc. offers the following comments to the notice of proposed establishment of Organization Designation Authorization Procedures in 14 CFR parts 21, 121, 135, 145, and 183:

- 1) The New Piper Aircraft, Inc. supports the concept of the proposed Organization Designation Authorization as developed by the ARAC and for the most part proposed;
- 2) With reference to the proposed 14 CFR part 183.51(b) "Personnel", The New Piper Aircraft, Inc. urges refinement of the rule or at least the referenced proposed Draft FAA Order 8100.ODA, to include provisions for AR training requirements to include FAA training similar to that given to current FAA certification engineers. It has been our experience that AR's need the same training that ACO engineers receive as a requirement for their job to function effectively. ACO engineers receive a standard course of training including (but not limited to, FAA Indoctrination, Part 21 Certification of Products and Parts, specific training for each discipline of the Aerospace Engineers particular function, i.e., Structural Loads, etc. An AR that does not have the benefit of FAA Academy training cannot be expected to perform the authorized functions to the same standards, policy and guidance as if they were an FAA employee.
- 3) With reference to proposed 14 CFR part 183.55 (b) "Limitations", The New Piper Aircraft, Inc. supports the ARAC original proposal to provide the FAA with the ability to authorize an ODA holder to make staff changes in accordance with FAA approved ODA procedures without prior FAA approval of each specific AR applicant. If the ODA is properly defined, approved, administered and monitored, the systems approach to OAD will either work or not. This is a key element in the success of the ODA system and FAA buy-in is crucial. Without it, there is little advantage to ODA compared to the existing DDS system.

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

Respectfully,

ORIGINAL SIGNED

Albert "Jack" Mill
Director, Aircraft Certification Services

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