ECS

May 20, 2004

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Washington D.C. 20590-001

SUBJECT: Comments on Organization Designation Authorization (ODA) - Docket number FAA-2003-16685

To who it may concern:

We would like to submit the following comments for your consideration:

ODA Support

As a holder of over 50 FAA Supplemental Type Certificates, ECS fully supports the ODA concept and looks forward to implementation of a fully operational ODA program very soon. We feel that the ODA concept will reduce the DER oversight activities as well as other administrative functions of the FAA while increasing capacity for finding compliance with regulations and preserving or increasing the level of safety for the flying public.

Proposed Change to allow ODA Issuance of Part Manufacturer Approval (PMA)

We would like to propose a change to Section 183.49, Authorized Functions. That section presently states the following: "Currently, delegation to ODAs would not be considered for-...." "Issuing Parts Manufacturer Approval (PMA);"

Since design approval for PMA is currently part of the STC process and is usually issued by our FAA Aircraft Certification Office (ACO) at the time of STC issuance, we believe that design approval for PMA naturally should be a part of the ODA process and delegation.

If ODAs are not allowed to issue PMA, they will need to issue an STC for a project and then submit the approved STC data to the applicable ACO for review and PMA design approval. This would reduce the overall effectiveness of the combined output of the ODA and FAA ACO.

Background

A few years ago, I attended an ARAC meeting on ODA where the PMA issuance matter was discussed. At that time meeting attendees were concerned that an ODA could possibly issue an STC and PMA for time limited critical parts, such as turbine engine components. The concern was that the parts might not meet all the applicable requirements. We believe this matter can be addressed in the limitations of the specific ODA's authorization. We think it is reasonable to allow an ODA to issue PMA design approval for parts that they customarily design and which are normally approved as part of current ACO STC projects.

ECS is committed to support the ODA concept and we are willing to participate in any further discussions or activities needed to help implement the ODA process.

Best Regards,

Dennis C. Baker
Vice President, Engineering

Electronic Cable Specialists, Inc.
5300 W. Franklin Drive,
Franklin, Wisconsin 53132 U.S.A.

Tel: 414.421.5300
Fax: 414.421.5301

800.327.9473
Web: www.ecsdirect.com

ISO9001:2000 AS9100:2001 REGISTERED 012558