

I strongly oppose this proposal on several grounds. Consider that United States Code section 44702 (b) (1) (a) states that to provide service with the highest possible degree of safety in the public interest. Given that, consider that an ODA 's interest is primarily in earnings. The proposal is in essence selling safety to the lowest bidder there is an inherent conflict of interest in the recommended proposal. FAA Order 8100.9, paragraph 3-5(d) clearly expands on the potential of conflicts of interest and states that that it is essential to preclude this from occurring, however the proposal is not for monitored individuals but potential money earners. There are items which are considered INHERENTLY GOVERNMENTAL and in August of 2002 the FAA recognized this and chose not to delegate the functions, yet in less then 2 years there is a change in thought. What has occurred for this paradigm shift. The public will not be served, nor will it be in their interest if the major OEMs and Airlines have a reduced requirement and can purchase/own designees. The Federal Aviation Administration should reflect and reconsider who truly benefits from this recommendation and the delution of regulatory authority. If there is a need for change, it would be the need for the FAA to hire more inspectors and lessen the work load to enable better mentoring and oversight of designees. Creating a Cash for Service Designee company is introducing a known risk into an already troubled aviation industry.