



WHS 04-20

**General Aviation  
Manufacturers Association**

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October 12, 2004

Docket Management Facility  
U.S. Department of Transportation  
400 Seventh Street, SW.  
Nassif Building, Room PL-401  
Washington, DC 20590-001

**Subject: Docket FAA- 2004-18775: GAMA Comments on NPRM 04-11, Safety Standards for Flight Guidance Systems**

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The General Aviation Manufacturers Association (GAMA) is a trade association representing over 50 manufacturers of fixed-wing aircraft, engines, avionics, and components. GAMA appreciates the opportunity to review the Notice of Proposed Rulemaking (NPRM) 04-11, Safety Standards for Flight Guidance Systems (69FR50240, 08/13/2004) and offers the following comments for your consideration.

Several GAMA member companies participated on the ARAC working group that developed the recommendation to address the airworthiness issues and revise the safety standards for flight guidance systems. Overall, GAMA endorses the proposed rule and commends the FAA and ARAC for their efforts in generating this updated proposal.

Specifically, GAMA concurs with and supports the preamble language contained on page 50248 of Federal Register Volume 69, No. 156. This section of the document refers to paragraph (g) of the rule, and identifies a concern expressed by a working group member about mandatory compliance methods. The FAA response is viewed by GAMA as welcome and appropriate; this organization supports the analysis of service history data and determination of applicability as a means of compliance for the stated requirement.

In addition, a discussion regarding paragraph (h) of the rule is contained on the same page of the Federal Register. Again, GAMA agrees with the FAA statement that in certain cases it may not be possible to have the updated FGS be in compliance with the proposed paragraph. We support the FAA's position that where such a case exists the applicant should design the best system possible to meet the intent of the requirement.

Finally, paragraph (l) of the rule is discussed on page 50249 of Federal Register Volume 69, No. 156. The FAA indicates that a change was made to the ARAC report, and the term "unsafe



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condition" was changed to "potential hazard." GAMA agrees with the FAA that this change is necessary, and supports this finding.

GAMA appreciates the opportunity to review the proposed rule to update safety standards for flight guidance systems. Please contact me at (202) 393-1500 or [wdesrosier@gama.aero](mailto:wdesrosier@gama.aero) if there are any questions related to the above comments.

Sincerely,

A handwritten signature in black ink that reads "Walter Desrosier". The signature is written in a cursive style with a prominent initial 'W'.

Walter Desrosier  
Vice President, Engineering & Maintenance