



MODIFICATION AND REPLACEMENT PARTS ASSOCIATION

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David Hemepe, Manager
Aircraft Certification Service, Aircraft Engineering Division
Orville Wright Bldg. (FOB10A)
Federal Aviation Administration
800 Independence Ave., SW
Washington, DC 20591

Dear Mr. Hemepe,

Recently, many of the Modification and Replacement Parts Association (MARPA)'s members have expressed to MARPA their companies' concerns regarding FAA policies and procedures under SFAR88 ADs, as applied to PMAs.

There are three issues that member companies have encountered regarding SFAR88. The first issue is that CDCCL-equivalent FAA-PMA parts were disallowed as a means of compliance with SFAR88 ADs. The FAA should address this issue by revising the SFAR88 ADs to incorporate PMAs as Methods of Compliance (MOC).

The second issue is that there exists no FAA guidance on approvals of CDCCL-equivalent FAA-PMA parts as AMOC to SFAR88 ADs, and no compliance time has been provided. The FAA should consider summarily approving all existing CDCCL-equivalent FAA-PMAs as MOC or AMOC to the SFAR88 ADs. In the alternative, FAA Headquarters may provide the field offices with clear guidance for processing individual AMOC requests, as outlined in the attached issue paper.

The third issue member companies have experience in regards to SFAR88 ADs is that there are currently no effective means for communication of AMOC approvals for SFAR88 ADs. MARPA would urge the FAA to consider streamlining the AMOC approval communication process as applicable to SFAR88 ADs by revising the SFAR88 ADs to replace the direct reference to the specific TC holder report or maintenance planning document with reference to an AD-specific, globally accessible MOC list that would be published on the internet and maintained in real time.

We have attached an issue paper on the SFAR 88 ADs prepared by one of our member companies, Wencor. We look forward to meeting with you and discussing a resolution to this issue.

Very Truly Yours,

Jason Dickstein
MARPA President