



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

**MAY 19 2009**

Mr. Jason Dickstein  
President, Modification and Replacement Parts Association  
2233 Wisconsin Avenue, NW  
Suite 503  
Washington, DC 20007

Dear Mr. Dickstein:

Your letter of April 6, 2009 expressed your membership's concern about our policies and procedures for implementing Airworthiness Directives (AD) for SFAR 88 and their effects on PMA holders. These directives required operators of transport category aircraft to implement Critical Design Configuration Control Limitations (CDCCL) on fuel tanks and their components. These CDCCL prevent ignition sources and preserve these ignition source prevention features in fuel tanks throughout the service lives of the aircraft.


Your membership had three issues:

- Replacement parts from Parts Manufacturer Approval (PMA) holders were disallowed as a means of compliance to the AD,
- We provide no guidance on how to approve PMA parts as Alternative Means of Compliance (AMOC) to the SFAR 88 AD,
- We lack effective communication tools for disseminating subsequent AMOC approvals to aircraft operators.

Then you made specific recommendations to resolve each of the above concerns.

Our Transport Aircraft Directorate will respond to each of the above concerns and associated recommendations. We discussed these issues and coordinated policies with them to resolve many of your concerns. Please contact me if you have any further questions.

Sincerely,

  
David W. Hempe  
Manager, Aircraft Engineering  
Division