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By email to John.Miliewski@faa.gov
and by facsimile transmission to 202-267-5340

John L Miliewski
Aviation Safety
Aircraft Certification Service
Certification Procedures Branch, AIR-110
800 Independence Ave., SW
Washington, DC 20591

Dear John:

You have opened draft FAA Order 8110.42C, Parts Manufacturer Approval Procedures, for a 30-day public comment period. As we discussed on the phone last week, MARPA is requesting that you extend this comment period for a total of 30 days in order to make it a 60 day comment period.

Under this proposed extension, the comment period would remain open until December 27, 2007 (the 26th is a federal holiday).

The reason for this request is because there has been relatively little notice to the public about this comment period. The FAA was good enough to announce the comment period at the MARPA annual conference. To cover PMA companies that were not present at the Annual Conference, MARPA has also announced the availability for comment of this publication to its membership in a mailer sent out last week. We feel that this is an extremely important document. As you know, many of the changes in this order were requested by industry in order to be sure that the FAA was providing adequate guidance on processing PMA applications. We would like to be sure that the industry as a whole finds the changes to be acceptable, and also we would like to be sure that no one in the industry feels that this revision was unnecessarily rushed.

MARPA has asked its membership to provide the Association with comments on the draft and MARPA intends to forward a compilation of the industry's comments to the FAA with the aim of providing constructive suggestions to make this the best document it can be.

To facilitate this process, we feel that extending the comment period by an additional 30 days would be appropriate.

Thank you.

Respectfully submitted;

Jason Dickstein
MARPA President