

August 17, 2015

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Aircraft Certification Service,
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Delivered electronically joseph.palmisano@faa.gov

RE: FAA Order 8120.16, Suspected Unapproved Parts Program

The National Air Transportation Association (NATA) is the public policy group representing the interests of aviation businesses before Congress, federal agencies and state and local governments. NATA's nearly 2,300 member companies are a vital prerequisite for a vibrant general aviation sector providing fuel, aircraft maintenance, parts sales, storage, rental, airline servicing, flight training, Part 135 on-demand air charter, and fractional aircraft program management. As a result, our members are directly impacted by the FAA's revision to the Suspected Unapproved Parts Program (SUP) and FAA Order 8120.16. We therefore appreciate the opportunity to submit comments.

The NATA understands that the purpose of the revision is not a substantive policy change that effects our industry or the industry at large, but an administrative change to reflect transfer of Office of Responsibility (OPR) from Flight Standards Service, Aircraft Maintenance Division, (AFS-350) to Aircraft Certification Service, Design, Manufacturing and Airworthiness Division (AIR-100).

NATA members understand the potential effect that unapproved parts can have on the industry and applauds the FAA for the recognition that while unapproved parts can affect everyone in the industry the programmatic responsibility belongs under the Aircraft Certification Service. NATA also agrees with the FAA when it states in the revised Order that an improperly maintained/altered part may not be an unapproved part, but rather a part that is rendered ineligible for installation because the part was not maintained in accordance with the provisions of 14 CFR, part 43. We also agree with the FAA's position that improperly

maintained parts should be investigated under the FAA's Compliance and Enforcement Program.

NATA values the opportunity to participate in the review of the Order and we applaud efforts by the FAA to improve the oversight of such an important program by clarifying the responsibility for initiating, investigating and closing a SUP case and removing definitions that are already defined in the FAA regulations.

Sincerely,

A handwritten signature in blue ink, appearing to read "John McGraw", with a stylized flourish at the end.

John McGraw
Director, Regulatory Affairs