
Identifying/Marking Influencing Parts

NATA opposes proposed language directing the FAA to develop duplicative and unnecessary regulations on the identifying and marking of “influencing parts.” Current regulations already accomplish the proposal’s objectives and small aviation businesses would bear the financial cost of an unnecessary regulatory update, thereby driving up costs for businesses, general aviation aircraft owners and operators, air carriers and maintenance providers. The proposal runs counter to a primary objective of the upcoming FAA reauthorization – prioritization of agency functions and greater FAA collaboration with industry and labor stakeholders.

- **No value to aviation safety.** There is no safety issue associated with the current regulations and related guidance addressing aircraft parts, particularly “life-limited” and “influencing parts.” Current regulations already establish standards for marking and tracking life limited parts. FAA Advisory Circular 33.70-1 also provides industry with guidance on how to meet the life-limited parts integrity requirements of the regulations.

Influencing parts, whether the original approved equipment or approved after market, integrate with life-limited parts installed in an engine. The FAA requires the marking and identification of influencing parts installed on an engine, for example an oil seal. Updating or replacing an influencing part with an approved after-market part poses no threat to safety or the functionality of the engine. Current requirements have a proven safety record and address parts important to an aircraft’s ongoing airworthiness and operation. Adding duplicative regulation and guidance will create confusion and uncertainty.

- **Harmful to small aviation businesses.** Such an effort will drive up costs for U.S. job creators. Aviation companies, including small businesses, eventually bear the economic burden of any regulatory update and such measures have a disproportionate impact on small businesses. The proposal will simply drive up the cost of parts acquisition by adding another layer of approval and requirements by the FAA.
- **Misallocates government resources.** In a July 7th [letter](#) sent to leadership of the House Transportation and Infrastructure and the Senate Commerce Committees, a broad coalition of aviation stakeholders noted that the FAA has limited resources and many congressional mandates already in place. “Forcing the agency to initiate an unnecessary rulemaking in an area it has already issued regulations and guidance is a misallocation of scarce resources and creates inefficiencies.”
- **Contrary to reauthorization principles.** Congressional leaders have prioritized an FAA reauthorization framework that streamlines the regulatory processes, greater collaboration with industry and labor stakeholders, and increased transparency and accountability for both the FAA and industry. An unnecessary rulemaking such as this misdirects limited FAA resources from the key safety initiatives and important congressionally mandated priorities.