

September 28, 2015

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*Delivered electronically joseph.palmisano@faa.gov*

**RE: Advisory Circular 21-29D, Detecting and Reporting Suspected Unapproved Parts**

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 Advisory Circular (AC) 21-29D. We therefore appreciate the opportunity to submit comments.

NATA members understand the potential effect that unapproved parts can have on the industry and value the opportunity to participate in the review of the AC. We applaud efforts by the FAA to provide standardized guidance to the aviation community for detecting and reporting suspected unapproved parts to the Federal Aviation Administration (FAA).

In review of the AC, NATA offers the following comments to maintain the consistency of the AC with the FAA's SUP Order 8120.16 also just recently revised.

1. Page 1 paragraph 5, Detection of SUPs. Suggest revising the current sentence from, *"The airworthiness of aeronautical products may be in question if the design and quality of the parts are unknown"* to **"The airworthiness of aeronautical products may be in question if the product does not meet its type design and is unsafe for operation."**
2. In the same paragraph we also suggest the FAA reiterate that an approved part not maintained in accordance with Title 14 CFR Part 43 does not necessarily mean it is a SUP. It is a violation of Part 43. This would mat the same language that is in the SUP Order.
3. The NOTE on page 4 paragraph 5.3.8. Suggest that the FAA include consumables in the note along with raw materials. Normally, consumables are included when discussing raw materials.

Sincerely,



John McGraw

Director, Regulatory Affairs

## DOCUMENT REVIEW LOG

<b>1. Document No.:</b> Draft AC 21-29D	<b>2. Project Manager:</b> Joe Palmisano, AIR-112,	<b>3. Reviewing Office:</b> National Air Transportation Association (NATA)	<b>4. Date of Review:</b> 9/13/15	<b>5. Date of AIR-100 Disposition:</b>
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**Instructions for Completing the Document Review Log**

Blocks 1 & 2: To be completed by AIR-100 Project Manager (PM), prior to sending out to field offices.

Blocks 3 & 4: To be completed by Field Offices. Enter Office Symbol, name of reviewer, and reviewer phone number.

Block 5: To be completed by AIR-100 PM, after receiving comments from field offices. Enter date of disposition.

The below columns are to be completed by the Field Offices, except for the "AIR-100 Disposition" column.

AIR-100 PMs disposition comments in the last column below. Enter the reasons for non-incorporated comments. Identify each disposition as one of the following:

- Adopted   • Partially Adopted   • Non-Concur   • Concur but Outside of Scope (Will be considered in next change/revision)   • Answer to Question or Statement.

Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	AIR-100 Disposition:
1.	Pg 1 para 5	Airworthiness -	For consistency with other policy and regulations, Please stay with the definition of AW	may be in question if the product does not meet it type design and not safe for operation.	
2.	Pg 1 para 5	may be in question if the design and quality of the parts are unknown.	Stay consistent with the regulation and the SUP Order.	Please reiterate that an approved part not maintained IAW part 43 doesn't mean it is a SUP, it is a violation of part 43. The same language is in the SUP Order.	
3.	Pg 4 para 5.3.8	Include consumables in with raw materials	Consumables are included when discussing raw materials	Add Consumables	
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