

February 27, 2017

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Griffin Moar  
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RE: Request for Extension of Comment Period  
Draft Advisory Circular 43-ARTS, Use of FAA Form 8130-3 for Approval for  
Return to Service Under Part 43

Dear Mr. Moar:

The undersigned companies and organizations represent a cross-section of the aviation industry, covering a range of interests including commercial air carriers, aviation service providers, design and production approval holders and repair stations. [Draft Advisory Circular 43-ARTS](#) significantly revises the agency's interpretation of the requirements for using FAA Form 8130-3 for approving articles for return to service. Because the draft AC does not mirror the maintenance recordkeeping regulations and conflicts with existing agency policy, additional time is required for industry to develop comprehensive substantive comments. Premature release of this AC will be detrimental to aviation safety, and, among other things, cause both industry and the FAA to expend considerable resources to correct the guidance after issuance.

For that reason, the undersigned companies request the March 13, 2017 deadline for commenting on Draft AC 43-ARTS be extended 90 days.

Sincerely,

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Return to Service Under Part 43

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