

	AVS Quality Management System	QPM # AIR-001-007-F1	Revision 0
		Title: Document Review Log	Date: June 19, 2009

1. Document No.: DRAFT AC 33-2C General Type Certification Guidelines for Turbine Engines	2. Project Manager: Marc Bouthillier	3. Reviewing Office: MARPA	4. Date of Review: March 8, 2013	5. Date of Disposition: April 9, 2013	
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Item No:	Page and Paragraph No:	Comment:	Reason:	Recommendation:	Disposition:
1.		The first problem this proposed language is that it is inconsistent with existing language in FAA Advisory Circular 20-62E (para. 9), which states that military surplus items may be used on civilian aircraft, “provided it is established that they meet the standards to which they were manufactured, interchangeability with the original part can be established, and they are in compliance with all applicable ADs.”			Not concur. The AC does not deal with model conversions. No direct link. This AC deals with parts to be installed in products. No effect on model conversions.
2.		This language is also inconsistent with the language of AC 21-13 (para. 3), which permits use of military surplus in civilian aircraft when a demonstration is made that the aircraft (with the military surplus) conforms to the FAA type certificate and is in a condition for safe operation (the guidance confirms that the burden is on the applicant for a certificate of airworthiness to make this showing.			Not concur. AC section does not deal with model conversions; it assumes an FAA TC exists for the military product. Aircraft level issue only. No effect on engine model conversions.

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3.		The language also essentially nullifies AC 20-142, which provides guidance for taking military surplus engines (<i>inter alia</i>) and using them in civilian aircraft.			Not concur. AC does not address the model conversion action. No effect on model conversions.
4.		At its root, a modification is a part-43-regulated activity, and the modern trend has been for independent repair stations with significant engineering resources to be capable of highly complex alterations through Supplemental Type Certificates (STCs). Therefore it is reasonable to believe that an independent repair station with significant engineering resources would be able to develop its own process for conversion, and would be able to obtain approval for the elements of this process that required approval. We are familiar with repair stations that have converted surplus military engine components to civilian use, consistent with the guidance of the afore-mentioned advisory circulars.			Not concur. The guidance is reasonable to assume for transport category engines.

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5.		<p>In addition to the inconsistency with existing FAA guidance, the proposed language also would provide to TC holders a monopoly over the instructions for conversion, which would thus give them a virtual monopoly over the actual conversion. Such a monopoly is inappropriate, as the FAA has no authority to create such a monopoly (it would tie the maintenance community to the manufacturing community on an issue that should be competitively open to the maintenance community). It is inconsistent with current market conditions in which multiple non-TC participants are permitted to create data and mechanisms for FAA review and approval.</p>		<p>Concur in part. There is no inconsistency with existing guidance. Concur that the text can infer a monopoly. The text is revised to remove this statement.</p>
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