

**PUBLIC COMMENT - DOCUMENT REVIEW LOG**

<b>1. Document No.:</b> FAA Order 8100.11D - Requirements for Finding Undue Burden and No Undue Burden Under 14 CFR Part 21		<b>2. Project Lead:</b> David Magruder, AIR-143, (202) 267-1627	<b>3. Reviewing Office (Name and Phone Number):</b>	<b>4. Date of Review:</b>	<b>5. Date of AIR-100 Disposition:</b>
<b>Item No:</b>	<b>Page and Paragraph No:</b>	<b>Comment:</b>	<b>Reason:</b>	<b>Recommendation:</b>	<b>AIR-100 Disposition:</b>
1.	Global.  GE Aviation	<p>In both documents terms are used that are important to understanding the FAA's intent in identifying undue burden situations. Yet these terms are not defined either directly or by reference in the documents. The terms we are referring to are: "critical part or process", "critical or high risk parts", both found in the draft order; as well as in the draft AC the terms "critical characteristics", "critical functions" and "exotic materials".</p> <p>In the way, and where the terms are used (and with no explanations or references) in these drafts it is difficult to determine whether "critical" and "high risk" are related to the subject part's function in the product or in its manufacture. And we cannot find any FAA use of the term "exotic materials" anywhere else.</p>	All of this means that neither the order or its AC will provide good direction or guidance on this aspect of understanding and determining undue burden, leading to applications being subjective and variable.		Adopted. Added note referencing language found in 21.139(c)