

August 25, 2015

Delivered by email; read receipt requested: susan.cabler@faa.gov

Susan Cabler
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Re: Request for Extension of Comment Period for Order 8110.54B and Advisory Circular
(AC) 20-ICA, Instructions for Continued Airworthiness

Dear Ms. Cabler,

The undersigned request an extension of the normal comment period for the above referenced documents.

As you know, the issuance of guidance regarding Instructions for Continued Airworthiness (ICA) is a complicated issue that the Aviation Safety Organization (namely, Aircraft Certification and Flight Standard Services) has struggled with for more than 30 years. The draft guidance documents will impact hundreds of design and production approval holders as well as thousands of repair stations, air carriers and general aviation operators.

The undersigned associations represent thousands of large and small certificate holders that will be impacted by the guidance; we respectfully request the agency grant an extension to the current comment period deadline of October 6, 2015. The delay will not impact safety or the agency's internal processes.

We look forward to the agency's favorable response and the enhanced opportunity to provide comprehensive and meaningful comments.

Sincerely,

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